

EXHIBIT D

1
2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE SOUTHERN DISTRICT OF NEW YORK

4 -----x
5 EASTERN PROFIT CORPORATON LIMITED,
6 Plaintiff/Counterclaim Defendant,

7
8 Case No. 18-cv-2185

9 v.

10 STRATEGIC VISION US, LLC,
11 Defendant/Counterclaim Plaintiff.

12 -----x
13 1:47 p.m.
November 19, 2019

14
15 405 Lexington Avenue
New York, New York

16
17 DEPOSITION of FRENCH WALLOP, testifying
18 under Rule 30(b)(6) on behalf of STRATEGIC VISION
19 US, LLC in the above entitled matter, pursuant to
20 Notice, before Stephen J. Moore, a Registered
21 Professional Reporter, Certified Realtime Reporter
22 and Notary Public of the State of New York.
23
24
25

<p style="text-align: right;">Page 2</p> <p>1</p> <p>2 A P P E A R A N C E S:</p> <p>3</p> <p>4 GRAVES GARRETT LLC</p> <p>5 Attorneys for Eastern Profit</p> <p>6 Corporation Limited</p> <p>7 1100 Main Street</p> <p>8 Kansas City, Missouri 64105</p> <p>9</p> <p>10 BY: EDWARD D. GREIM, ESQ.</p> <p>11 and</p> <p>12 JENNIFER DONNELLI, ESQ.</p> <p>13</p> <p>14 PEPPER HAMILSTON, LLP</p> <p>15 Attorneys for Strategic Vision US,</p> <p>16 LLC</p> <p>17 1313 N. Market Street 5100</p> <p>18 Wilmington, Delaware 19899</p> <p>19</p> <p>20 BY: JOANNA CLINE, ESQ.</p> <p>21</p> <p>22 ALSON PRESENT:</p> <p>23 MICHAEL WALLER</p> <p>24 YVETTE WANG</p> <p>25</p>	<p style="text-align: right;">Page 4</p> <p>1 FRENCH WALLOP</p> <p>2 THE VIDEOGRAPHER: Good</p> <p>3 afternoon. We are now recording and on</p> <p>4 the record. The time is 1:47 p.m., on</p> <p>5 November 19, 2019.</p> <p>6 This is video 1 in the deposition</p> <p>7 of French Wallop taken by counsel for the</p> <p>8 Plaintiff in the matter of Eastern Profit</p> <p>9 Corporation, Limited, versus Strategic</p> <p>10 Vision US, LLC, filed in the U.S. District</p> <p>11 Court, Southern District of New York, case</p> <p>12 number 18 CV 2185 JGK.</p> <p>13 This deposition is being held at</p> <p>14 405 Lexington Avenue, New York, New York.</p> <p>15 My name is George Libbares. The court</p> <p>16 reporter is Stephen Moore, we are here for</p> <p>17 Veritext New York.</p> <p>18 Counsel will now state their</p> <p>19 appearances and the court reporter will</p> <p>20 administer the oath.</p> <p>21 MS. CLINE: Johanna Cline, Pepper</p> <p>22 Hamilton, for Eastern Profit.</p> <p>23 And again, just to clarify, this is</p> <p>24 actually a deposition of Strategic Vision</p> <p>25 a corporate designee deposition, and Ms.</p>
<p style="text-align: right;">Page 3</p> <p>1</p> <p>2 EXAMINATION BY PAGE</p> <p>3</p> <p>4 MS. CLINE 6</p> <p>5</p> <p>6 E X H I B I T</p> <p>7</p> <p>8 Exbt 111 Calendar pages produced by 6 21</p> <p>9 Strategic Vision</p> <p>10</p> <p>11 Exbt 112 Document headed "Fish Tank 35 4</p> <p>12 for 10 people only"</p> <p>13</p> <p>14 Exbt 113 Color table for 51 7</p> <p>15 expenditures and payments to</p> <p>16 Strategic Vision U.S. and wires</p> <p>17 out to vendors</p> <p>18</p> <p>19 Exbt 114 Citibank Business 51 11</p> <p>20 Strategic Vision U.S., LLC bank</p> <p>21 statement from January 1, 2018</p> <p>22 through January 31, 2019</p> <p>23</p> <p>24 Exbt 115 Bill from Fletcher 69 4</p> <p>25</p>	<p style="text-align: right;">Page 5</p> <p>1 FRENCH WALLOP</p> <p>2 Wallop is the second of their deponents</p> <p>3 today.</p> <p>4 MR. GREIM: Eddie Greim and</p> <p>5 Jennifer Donnelly for</p> <p>6 Defendant/Counterclaim Plaintiff,</p> <p>7 Strategic Vision.</p> <p>8 And I agree with counsel's</p> <p>9 clarification.</p> <p>10 I would also state that we are here</p> <p>11 today after having already taken a</p> <p>12 30(b)(6) of Strategic Vision, we are here</p> <p>13 on negotiated topics with counsel for</p> <p>14 Eastern Profit.</p> <p>15 They are limited to the, basically</p> <p>16 topics that are stated in the notice,</p> <p>17 which related to the new counterclaim that</p> <p>18 was filed and various documents that were</p> <p>19 referred to us after the first 30(b)(6).</p> <p>20</p> <p>21 F R E N C H W A L L O P , called as a</p> <p>22 witness, having been first duly sworn by</p> <p>23 the Notary Public, was examined and</p> <p>24 testified as follows:</p> <p>25 EXAMINATION BY</p>

2 (Pages 2 - 5)

Page 6

1 FRENCH WALLOP
 2 MS. CLINE:
 3
 4 Q Ms. Wallop, you're testifying
 5 here today as a representative of Strategic
 6 Vision, right?
 7 A I am.
 8 Q And you're authorized to testify
 9 on behalf of Strategic Vision?
 10 A Correct.
 11 Q And you are the sole member of
 12 the Strategic Vision, LLC, correct?
 13 A Yes.
 14 Q You've always been the sole
 15 member of Strategic Vision, correct?
 16 A Yes.
 17 MS. CLINE: Can you mark this,
 18 please.
 19 (The above described document was
 20 marked SV Exhibit 111 for identification
 21 as of this date.)
 22 Q We have handed you what's been
 23 marked as Exhibit 111. And I can represent
 24 that this is an excerpt from the calendar pages
 25 or some calendar pages that Strategic Vision

Page 7

1 FRENCH WALLOP
 2 produced in this litigation.
 3 And my first question for you is
 4 whether these are pages from your calendar?
 5 A Yes. They appear to be.
 6 Q Right, and you recognize the
 7 handwriting on these pages as your handwriting?
 8 A I do.
 9 Q Could you just describe, please,
 10 your practices with respect to your calendar
 11 notations. As a general matter --
 12 MS. CLINE: Let me try again.
 13 Q As a general matter, in the end
 14 of 2017 and 2018, how did you use your calendar
 15 on a daily basis?
 16 A I used it -- I don't use any
 17 electronic calendars, because they are
 18 hackable. I use Post-Its, armed calendars,
 19 which you can print off like this from Outlook
 20 or whatever it is, and then I write in my
 21 schedule.
 22 Q And is it a proactive exercise,
 23 you calendar things that are coming up, or is
 24 it retroactive, meaning you make entries about
 25 things that have happened in the past?

Page 8

1 FRENCH WALLOP
 2 A No, it's proactive, at the time.
 3 Q Prospective, I suppose?
 4 A Prospective, yes.
 5 Q Looking at these particular
 6 pages with respect to November through February
 7 of '18, sorry, November of 2017 through
 8 February of 2018, did you, in fact, make these
 9 entries on or about the corresponding dates in
 10 the calendars?
 11 A Yes. Generally, in other words,
 12 if I was traveling, I would put London, and
 13 then I would write an arrow through the dates
 14 that I was going to be away on that day, and
 15 then I would fill in appointments in those
 16 countries or in that time frame.
 17 Q Is it fair to say that the
 18 entries that appear on page 1 you physically
 19 wrote in November, is that right?
 20 A Correct.
 21 Q And the entries that appear on
 22 page 2, which is, I guess I will use the Bates
 23 numbers, page 2103, you physically wrote those
 24 in December of 2017?
 25 A Yes, that's right.

Page 9

1 FRENCH WALLOP
 2 Q And with respect to page 2104,
 3 you physically wrote those entries in January
 4 of 2018?
 5 A Yes.
 6 Q And same question with respect
 7 to page 2105. Those entries you physically
 8 wrote in February of 2018, is that correct?
 9 A Yes.
 10 Q So you didn't fill any of these
 11 in at some point subsequent to February of
 12 2018, did you?
 13 A No.
 14 I may have copied something from
 15 a Post-It note that I had on the calendar, but
 16 no, this is an accurate reflection of my
 17 calendar.
 18 Q So, let me just try again.
 19 So, tell us, were there
 20 instances in which you populated any of these
 21 entries subsequent to February of 2018?
 22 A Not to my recollection, no;
 23 other than the Post-It notes. In other words,
 24 I explained that I have Post-It notes that are
 25 generally the size of this that I put down on

Page 10

1 FRENCH WALLOP
2 the calendar as to what I'm doing, and then I
3 will put it onto the calendar if they occurred.
4 Q And so when did you -- so when
5 did you transcribe any notes from Post-It notes
6 onto the actual calendar pages in Exhibit 111?
7 A These were done at the time of
8 the month or the day of the year. I mean,
9 there wasn't any change.
10 Q Okay. I am just trying to
11 understand what your practice is.
12 So, to the extent that some of
13 these entries were originally written on
14 Post-It notes and then transcribed onto the
15 calendar pages, did any of those transcriptions
16 take place subsequent to February 2018?
17 A No.
18 Q Did you consult with anybody
19 about what merits an entry on your calendar?
20 A No.
21 Q Turn, if you would, to January
22 2018.
23 On January 8 there is an entry
24 filled in which you have written, "Set up Team
25 1." Do you see that?

Page 11

1 FRENCH WALLOP
2 A I don't see that.
3 Q I misread the number.
4 On January 9th, 2018, there is
5 an entry that says, "Set up Team 1." Do you
6 see that?
7 A Yes.
8 Q What does that mean?
9 A That means that we were having
10 meetings with Team 1, and that was the
11 beginning of the setup.
12 Q Who was doing the setting up on
13 behalf of Strategic Vision?
14 A Mike Waller and myself.
15 Q So was there, in fact, a setup
16 meeting with Team 1 on Tuesday, January 9th?
17 A Well, if I put it here, that
18 would be the fact, yes.
19 Q And so you were present for that
20 meeting?
21 A Yes.
22 Q And where was it?
23 A I believe it was at my home.
24 Q That's in Virginia, right?
25 A Yes.

Page 12

1 FRENCH WALLOP
2 Q And so members of Team 1 were
3 present at your home on January 9th?
4 A I believe so, I'm not 100
5 percent sure, because Mike was having
6 conversations with them as well.
7 So -- but I think that was the
8 case.
9 Q Do you recall having met members
10 of Team 1?
11 A Yes.
12 Q And was that meeting at your
13 house?
14 A Several times, but I can't be
15 specific on which date.
16 Q So you personally met members of
17 Team 1 on more than one occasion?
18 A Yes.
19 Q And if you go forward a little
20 bit to January 11th, there is another entry
21 that says "Team 1 meeting." Do you see that?
22 A Yes.
23 Q And was that a second meeting
24 involving Team 1?
25 A Must have been, yes.

Page 13

1 FRENCH WALLOP
2 Q Does the fact that it is
3 included on your calendar mean you were there,
4 you were physically present?
5 A Yes.
6 Q And do you remember where that
7 meeting was?
8 A Probably also in Virginia, if
9 the first one was.
10 I honestly don't remember.
11 Q Drop down to January 25th. It
12 says, "Team 1 work day." Do you see that?
13 A Yes.
14 Q What does that mean?
15 A That means one of the Team 1
16 members was in Washington. It was a meeting.
17 Q And the meeting involved you
18 personally?
19 A Yes, and Mike Waller.
20 Q And then, if you could just look
21 at January 26th, read your entry for us on that
22 day.
23 A It says, "MW/FW, New York, 11:00
24 a.m." And then it says, underscored, then it
25 says, "Ten days after."

<p style="text-align: right;">Page 14</p> <p>1 FRENCH WALLOP</p> <p>2 Q Okay. What do those entries</p> <p>3 mean?</p> <p>4 A Well, it's Mike Waller and</p> <p>5 French Wallop in New York meeting Guo at 11:00</p> <p>6 a.m., which was about ten days after the</p> <p>7 contract was underway.</p> <p>8 It was actually underway</p> <p>9 earlier, but we gave him a leeway of ten days;</p> <p>10 so that's why I have ten days after.</p> <p>11 Q Looking up, sort of directly up</p> <p>12 in that column, on January 5th, there is an</p> <p>13 entry there that says, "Contract signed." Do</p> <p>14 you see that?</p> <p>15 A Yes.</p> <p>16 Q So I am trying to understand,</p> <p>17 what does your entry on the 26th above the "ten</p> <p>18 days after," what does that correspond to?</p> <p>19 A Well, if you go back ten days,</p> <p>20 that would get it to the 16th, right?</p> <p>21 The 16th of January, and we had</p> <p>22 said to Guo at that meeting that it would have</p> <p>23 been -- we were giving him an additional ten</p> <p>24 days like credit, because we were trying to get</p> <p>25 the team set up and we didn't get the wires</p>	<p style="text-align: right;">Page 16</p> <p>1 FRENCH WALLOP</p> <p>2 \$25,000.</p> <p>3 Q Then there is an EXP. Does that</p> <p>4 mean expenses?</p> <p>5 A Yes. I'm sorry.</p> <p>6 Q So, the \$25,000 wire to</p> <p>7 Georgetown Research was for expenses?</p> <p>8 A It was.</p> <p>9 Q Was it you who was in charge of</p> <p>10 setting up the wires?</p> <p>11 A Yes.</p> <p>12 Q Could you explain to us the</p> <p>13 entry on January 31st?</p> <p>14 A Yeah, it was Michael Waller</p> <p>15 returns with flash drive to Newark, and he had</p> <p>16 done a 24 hour round trip to collect a flash</p> <p>17 drive from his contact point in Europe.</p> <p>18 Q Why was that something important</p> <p>19 enough to note on your calendar on January</p> <p>20 31st?</p> <p>21 A Because it was important to show</p> <p>22 the delivery of when we were complying with an</p> <p>23 insistent Guo for information that he wanted to</p> <p>24 have yesterday.</p> <p>25 Q And then if you go back up to</p>
<p style="text-align: right;">Page 15</p> <p>1 FRENCH WALLOP</p> <p>2 sort of into the account that we were using or</p> <p>3 accessible until the -- truly until the 9th.</p> <p>4 Because we didn't -- we didn't</p> <p>5 have clean flash drives. We had had bad flash</p> <p>6 drives to begin with.</p> <p>7 So when we got the clean flash</p> <p>8 drive was when Mike and I got together with the</p> <p>9 team members for Team 1 that week.</p> <p>10 Because at that point then the</p> <p>11 money became hard that was in the account, and</p> <p>12 then we could begin the setup of getting the</p> <p>13 team started.</p> <p>14 So that's what ten days</p> <p>15 afterwards means; it was ten days after the</p> <p>16 16th.</p> <p>17 And Guo had said he was, you</p> <p>18 know, demanded to have massive amounts of</p> <p>19 information within ten days of setting up,</p> <p>20 which was highly unreasonable.</p> <p>21 Q Could you just decipher for us</p> <p>22 your entry on January 16th?</p> <p>23 A 16th.</p> <p>24 Wire out to Georgetown Research</p> <p>25 for \$200,000, and then I think another wire for</p>	<p style="text-align: right;">Page 17</p> <p>1 FRENCH WALLOP</p> <p>2 January 6th, where you wrote -- sorry, January</p> <p>3 5th, where you wrote "bad flash drives," do you</p> <p>4 see that?</p> <p>5 A Yes, that's correct.</p> <p>6 Q And you made that entry, you</p> <p>7 physically wrote that in your calendar on</p> <p>8 January 5th?</p> <p>9 A Yes.</p> <p>10 Q Why was it important for you to</p> <p>11 write that at that point in time?</p> <p>12 A Because we were supposed to be</p> <p>13 under contract, we had all these verbal</p> <p>14 agreements that had been bouncing back and</p> <p>15 forth like ping-pong balls, and Yvette arrived</p> <p>16 and she had bad flash drives.</p> <p>17 We had signed the contract, and</p> <p>18 then in order to download whatever it was that</p> <p>19 she had on her USB keys, I did that, and</p> <p>20 clearly it was a bad, bad flash drive.</p> <p>21 And it -- we agreed that I would</p> <p>22 have to come back to New York on, it must have</p> <p>23 been on Sunday, I remember, yes, it was Sunday,</p> <p>24 where I got the new flash drives.</p> <p>25 There were three flash drives,</p>

5 (Pages 14 - 17)

<p style="text-align: right;">Page 18</p> <p>1 FRENCH WALLOP</p> <p>2 and out of those three, only one was good, the</p> <p>3 other two were bad. In other words, that means</p> <p>4 there was malware in those flash drives.</p> <p>5 It's a reason for part of the</p> <p>6 delay.</p> <p>7 Q But you knew on January 5th that</p> <p>8 it would be important to document that they</p> <p>9 were bad?</p> <p>10 A Yes, absolutely.</p> <p>11 Q And what was the basis for that</p> <p>12 knowledge?</p> <p>13 A Because if they are bad, you</p> <p>14 need to make a note of that in your record, if</p> <p>15 you're monitoring something like this in the</p> <p>16 way of a project; perfectly reasonable.</p> <p>17 Q Can you turn to February,</p> <p>18 please?</p> <p>19 A Yes, I have it.</p> <p>20 Q Just if you could just read the</p> <p>21 entry on February 1st.</p> <p>22 A It says "Mars, Walmart."</p> <p>23 Q Does that have anything to do</p> <p>24 with Eastern Profit?</p> <p>25 A It may have been a phone call I</p>	<p style="text-align: right;">Page 20</p> <p>1 FRENCH WALLOP</p> <p>2 possibly?</p> <p>3 A Possible.</p> <p>4 Q Possible?</p> <p>5 A Possible Team 2.</p> <p>6 Q So Team 2 had not been hired at</p> <p>7 this point?</p> <p>8 A No, I think we were just going</p> <p>9 there.</p> <p>10 Q And did you and Mr. Waller in</p> <p>11 fact go to Dallas to meet with Team 2?</p> <p>12 A Oh, yes, we did. I'm just</p> <p>13 looking, I think we went twice. So yes.</p> <p>14 Q And then most of these are just</p> <p>15 handwriting questions, February 5th, can you</p> <p>16 tell us what that entry says?</p> <p>17 A Sorry, I can't --</p> <p>18 That was a rigging group, if</p> <p>19 that's the right thing -- no, sorry, that looks</p> <p>20 like -- that was a meeting at 4:30 at my home</p> <p>21 with Lianchao and Mike.</p> <p>22 Q What was the -- it says here,</p> <p>23 does that mean it was at your home?</p> <p>24 A Yes.</p> <p>25 Q And what was the subject of that</p>
<p style="text-align: right;">Page 19</p> <p>1 FRENCH WALLOP</p> <p>2 had with some members of the Board. No, it had</p> <p>3 nothing to do with, probably should have been</p> <p>4 deleted.</p> <p>5 Q I should say that the items that</p> <p>6 have been redacted I gather have been redacted</p> <p>7 for relevance?</p> <p>8 A Because they pertain to other</p> <p>9 appointments or phone calls. Have nothing to</p> <p>10 do with Eastern Profit.</p> <p>11 Q On Groundhog Day there, what</p> <p>12 does your entry there say?</p> <p>13 A "Dallas" and then "Possible Team</p> <p>14 2."</p> <p>15 Q What did you mean by that?</p> <p>16 A Well, we decided we would go</p> <p>17 down and see Team 2.</p> <p>18 Q Why does this --</p> <p>19 A I mean, we assumed that it was</p> <p>20 going to be another team, because we were</p> <p>21 concerned about what Team 1 was finding, and</p> <p>22 Team 1 was finding all sorts of irregularities.</p> <p>23 So we wanted to have a second</p> <p>24 team to compare findings with.</p> <p>25 Q The entry says "POSS," is that</p>	<p style="text-align: right;">Page 21</p> <p>1 FRENCH WALLOP</p> <p>2 meeting?</p> <p>3 A Well, it would have had to do</p> <p>4 with the Guo contract.</p> <p>5 Q But just tell me as best you</p> <p>6 can, who said what to whom at that meeting on</p> <p>7 Monday, February 5th?</p> <p>8 A I have no recollection, other</p> <p>9 than we were concerned that we were finding</p> <p>10 issues with Guo's fake names and some of Guo's</p> <p>11 fake information that he had given us out of</p> <p>12 the 15 names that we had.</p> <p>13 And we were concerned about</p> <p>14 that, plus we also had inconsistencies with the</p> <p>15 information that we had gotten on Yvette's</p> <p>16 flash drives that we were using for Team 1.</p> <p>17 And at that point they were</p> <p>18 alerting us that there was a leak within the</p> <p>19 Guo system, from Yvette's flash drives, and we</p> <p>20 were very concerned as to what that was going</p> <p>21 to do with something that we held as being</p> <p>22 highly confidential and certainly of a concern.</p> <p>23 Q Did you share these concerns</p> <p>24 with Mr. Han?</p> <p>25 A Yes.</p>

6 (Pages 18 - 21)

Page 22

1 FRENCH WALLOP

2 Q What was his response?

3 A He was concerned, too.

4 Q What did he say?

5 A "I am concerned, too."

6 To the best of my recollection,

7 that would have been his normal response.

8 Q Do you remember how long the

9 meeting was?

10 A No, I think it was probably, it

11 might have been an hour, an hour and a half.

12 Q Did you and Mr. Waller discuss

13 possible litigation with Mr. Guo at this

14 meeting?

15 A What?

16 Q Did you and Mr. Waller discuss

17 possible litigation with Mr. Guo or Eastern

18 Profit at this meeting?

19 A Mr. Guo? You mean Lianchao?

20 I'm sorry, I don't understand

21 your question.

22 Q Just to make sure I'm tracking

23 the people present at this meeting on February

24 5th were you, Mike Waller and Lianchao Han?

25 A That's correct.

Page 23

1 FRENCH WALLOP

2 Q So I'm asking whether you and

3 Mr. Waller and Mr. Han discussed potential

4 litigation?

5 A No. There would have been no

6 reason to.

7 Q Did you discuss whether

8 Strategic Vision would take any action with

9 respect to Mr. Guo's asylum application at that

10 meeting?

11 A No.

12 Q Did you decide on next steps to

13 take as a result of what you discussed on that

14 meeting?

15 A Well, we were scrambling to try

16 to figure out who was telling us the truth.

17 We wanted to find out, comparing

18 the Dallas information, and I think I did go to

19 Dallas on the -- sorry, on the 2nd of February.

20 I think we went to Dallas on the

21 2nd of February, we had our preliminary

22 meeting, and then we flew down to Dallas on

23 the, looks like the 8th of February, to collect

24 whatever information they had been able to

25 retrieve in a week.

Page 24

1 FRENCH WALLOP

2 Q And that meeting was on February

3 8th?

4 A It looks like it, yes.

5 Q And what happened at that

6 meeting with Team 2 on February 8th?

7 A That was when we -- Adam Kraft

8 was there, Russell whatever his name was,

9 Ramsland or something, and then a fellow named

10 Lochnealy, plus the three analysts.

11 And we met with them to go

12 through some of the material that they showed

13 us in their files, and it was pretty thick.

14 At that point the -- I think it

15 was Russell Ramsland, we discussed the whole

16 process of what it was that we were retrieving

17 at that time.

18 They were the ones that said so,

19 it looks like Guo must be your client.

20 And we didn't admit to that, we

21 didn't say anything about it. We said well, we

22 need to find out what you have retrieved on the

23 names we have given you.

24 And that is, first of all, they

25 sort of pushed a bill across the table to us

Page 25

1 FRENCH WALLOP

2 for \$111,000 or \$117,000 and we looked at it.

3 We hadn't said that we would

4 sign on until we had some real information, and

5 they said well, we have got the real

6 information about who he is and what he is, but

7 we will not be able to share it because ta da,

8 he is records protected. These names are

9 records protected in the names that we had

10 given them.

11 Q Was that the first time you had

12 heard of the concept of records protected?

13 A Actually it is. First time.

14 Q And what did, what physically

15 did Team 2 show to you and Mr. Waller in that

16 meeting on February 8th?

17 A They showed us some diagrams and

18 they showed us a few sort of, what I would call

19 a short version of some reports.

20 But those apparently had also

21 been retrieved on the internet that they

22 compiled, and were doing, almost similarly to

23 what we were trying to do elsewhere, was

24 gathering different pieces of information to

25 put together for the whole piece.

<p style="text-align: right;">Page 26</p> <p>1 FRENCH WALLOP</p> <p>2 So they had pulled together some</p> <p>3 pieces, but the pieces that we already had, we</p> <p>4 were planning to hire them as sort of Team 2,</p> <p>5 so that we could compare the two sets of</p> <p>6 retrievals on Guo's fish.</p> <p>7 Q Was Team 2 working on the same</p> <p>8 fish that Team 1 was working on?</p> <p>9 A Yes, for certainly the first</p> <p>10 five.</p> <p>11 Q Can you just read what the</p> <p>12 February 9th entry says?</p> <p>13 A I had something at 9:30, and</p> <p>14 then it got cancelled due to my flight to</p> <p>15 Dallas.</p> <p>16 So, I'm not sure. I'm not sure</p> <p>17 if we went down on the 8th or we went down on</p> <p>18 the 9th, but it looks like we came back to D.C.</p> <p>19 on the 10th.</p> <p>20 Q Did you have a meeting with --</p> <p>21 so we talked about the meeting you had with Mr.</p> <p>22 Han on February 5th.</p> <p>23 A Correct.</p> <p>24 Q Did you have a meeting with Mr.</p> <p>25 Han in February subsequent to that day?</p>	<p style="text-align: right;">Page 28</p> <p>1 FRENCH WALLOP</p> <p>2 A Yes.</p> <p>3 That meant depart for LHR,</p> <p>4 sorry.</p> <p>5 Q So I'm asking two days prior to</p> <p>6 that, on February 16th, you said, "I think</p> <p>7 there was a meeting with Lianchao and</p> <p>8 Mr. Waller," right?</p> <p>9 A Yes.</p> <p>10 It's such a bad copy, I can't</p> <p>11 really tell where the lines went.</p> <p>12 So, it looks like Lianchao and</p> <p>13 Michael got together on the 16th. I can't</p> <p>14 remember if I was present or not.</p> <p>15 Q Would you have written it, would</p> <p>16 it have been your practice to write it on your</p> <p>17 calendar if you weren't going to be present?</p> <p>18 A Yes. Regarding this project,</p> <p>19 yes.</p> <p>20 Q Just why would you do that?</p> <p>21 A Why wouldn't I do it?</p> <p>22 Because it pertained to sort of</p> <p>23 a crisis situation with the information that</p> <p>24 was -- that we were receiving back from now two</p> <p>25 teams, and Lianchao was one of the people who</p>
<p style="text-align: right;">Page 27</p> <p>1 FRENCH WALLOP</p> <p>2 A I am looking. I can't read my</p> <p>3 own handwriting sometimes.</p> <p>4 I did not, but I think that Mike</p> <p>5 and Lianchao met on the 16th. I was not</p> <p>6 present.</p> <p>7 Q Okay, so just so the -- sorry to</p> <p>8 ask you to do this, but just on February 16th,</p> <p>9 what does that entry say?</p> <p>10 A It says "11:00 to 3:00, L and</p> <p>11 M," then it looks like something "9:00 p.m." I</p> <p>12 don't know what that is.</p> <p>13 Q How did you know that you</p> <p>14 weren't at the meeting?</p> <p>15 A Because you can see here, I left</p> <p>16 for London on the 18th, and I did not return</p> <p>17 from London and Zurich until maybe the 1st of</p> <p>18 March.</p> <p>19 I don't know, because I don't</p> <p>20 have March here, so I can't tell you.</p> <p>21 Q Just trying to follow, so the</p> <p>22 entry for February 18th says "Depart LHR,"</p> <p>23 right?</p> <p>24 A Yes.</p> <p>25 Q That's Heathrow?</p>	<p style="text-align: right;">Page 29</p> <p>1 FRENCH WALLOP</p> <p>2 had introduced us to Guo, along with Bill</p> <p>3 Gertz.</p> <p>4 Q Skip ahead to February 25th.</p> <p>5 That's the day you got home from London?</p> <p>6 A Yes.</p> <p>7 Q And did you meet with Mr. Waller</p> <p>8 and Mr. Lianchao Han on that day?</p> <p>9 A Yes.</p> <p>10 Q Do you remember what happened on</p> <p>11 that meeting?</p> <p>12 A I'm sure we were discussing the</p> <p>13 project.</p> <p>14 Q Eastern Profit had terminated</p> <p>15 the contract prior to then, correct?</p> <p>16 A I gather they had, but I was out</p> <p>17 of the country, so I didn't -- I hadn't seen</p> <p>18 anything about that.</p> <p>19 I think Mike had told me.</p> <p>20 Q Were you out of the country on a</p> <p>21 trip related to Eastern Profit?</p> <p>22 A Yes.</p> <p>23 Q And what were you doing?</p> <p>24 A Gathering intelligence.</p> <p>25 Q How did you go about that?</p>

8 (Pages 26 - 29)

<p style="text-align: right;">Page 30</p> <p>1 FRENCH WALLOP</p> <p>2 A Because I have a number of</p> <p>3 people that would have helped me and did help</p> <p>4 me in pulling information on Guo and on his</p> <p>5 people, that he was asking for research on.</p> <p>6 Q You were pulling information on</p> <p>7 Guo in the --</p> <p>8 A For Guo.</p> <p>9 Q For Guo.</p> <p>10 Were those people part of Team</p> <p>11 1?</p> <p>12 A No.</p> <p>13 Q Were they part of Team 2?</p> <p>14 A No.</p> <p>15 Q So, who were those people?</p> <p>16 A They were additional people.</p> <p>17 Q Did Strategic Vision pay for any</p> <p>18 services of the people you are referring to?</p> <p>19 A I believe so, yes.</p> <p>20 Q Are you talking about Fletcher?</p> <p>21 A Yes.</p> <p>22 Q Did you meet with anyone else</p> <p>23 other than Fletcher?</p> <p>24 A I did.</p> <p>25 Q Who else?</p>	<p style="text-align: right;">Page 32</p> <p>1 FRENCH WALLOP</p> <p>2 and I were trying to figure out how to handle</p> <p>3 Guo, because of the fact that we were</p> <p>4 delivering information and nothing seemed to</p> <p>5 satisfy him.</p> <p>6 Q Did you and Mr. Waller and</p> <p>7 Mr. Lianchao discuss litigation at that meeting</p> <p>8 on February 25th?</p> <p>9 A No.</p> <p>10 Q Did you --</p> <p>11 A Never.</p> <p>12 Q Did you discuss whether</p> <p>13 Strategic Vision would interfere with Mr. Guo's</p> <p>14 asylum application at that meeting?</p> <p>15 A No.</p> <p>16 Q Did you ever have that</p> <p>17 conversation with Mr. Han?</p> <p>18 A No.</p> <p>19 Q There is an entry on -- do you</p> <p>20 happen to know whether February 2018 was a leap</p> <p>21 year?</p> <p>22 In other words, does that say</p> <p>23 February 29?</p> <p>24 A It's 28th.</p> <p>25 It just goes to 28. If you look</p>
<p style="text-align: right;">Page 31</p> <p>1 FRENCH WALLOP</p> <p>2 A That's sort of confidential.</p> <p>3 MR. GREIM: Let's keep it there</p> <p>4 for now. There is apparently an order</p> <p>5 in this case.</p> <p>6 I don't know if it covers this or</p> <p>7 not, but if it doesn't, we will give the</p> <p>8 answer.</p> <p>9 Just if we could do it when we take</p> <p>10 our next break.</p> <p>11 MS. CLINE: Okay.</p> <p>12 Q So you and Mr. Waller met with</p> <p>13 Mr. Han on February 25th after Eastern Profit</p> <p>14 had terminated the contract, right?</p> <p>15 A Yes.</p> <p>16 Q What did you all say to each</p> <p>17 other? First of all, was the meeting in</p> <p>18 person?</p> <p>19 A Yes.</p> <p>20 Q And it was at your home in</p> <p>21 Virginia?</p> <p>22 A Yes.</p> <p>23 Q What did you all say to each</p> <p>24 other at that meeting?</p> <p>25 A I'm sure that Mike and Lianchao</p>	<p style="text-align: right;">Page 33</p> <p>1 FRENCH WALLOP</p> <p>2 above, the calendar, it's 27/28, so there is no</p> <p>3 29.</p> <p>4 Q What's -- so the last, just</p> <p>5 humor me, the last column, the bottom column on</p> <p>6 the page, right, starts with the 25th.</p> <p>7 That's when you got home from</p> <p>8 London?</p> <p>9 A Right.</p> <p>10 Q 26th is blank, right?</p> <p>11 A Yes.</p> <p>12 Q 27th you did something at 9:30,</p> <p>13 but it's redacted, right?</p> <p>14 A Yes.</p> <p>15 Q 28th you did something at 11:10,</p> <p>16 but that's redacted, correct?</p> <p>17 A Correct.</p> <p>18 Q I am trying to figure out what</p> <p>19 the entry is on what would be February 29th</p> <p>20 there?</p> <p>21 A I can't really tell unless it</p> <p>22 just says "depart 6:00 a.m." So I don't know,</p> <p>23 where is the rest of the calendar?</p> <p>24 If you have the March calendar,</p> <p>25 I can maybe piece it together.</p>

<p style="text-align: right;">Page 34</p> <p>1 FRENCH WALLOP</p> <p>2 Q Did you take any, putting aside</p> <p>3 the calendar, do you remember whether you took</p> <p>4 any business trips with respect to the Eastern</p> <p>5 Profit matter subsequent to your trip to London</p> <p>6 where you got home on February 25th?</p> <p>7 A Yes.</p> <p>8 Q And describe those.</p> <p>9 A Well, without a calendar, I</p> <p>10 can't.</p> <p>11 Q You have no memory, you know you</p> <p>12 went somewhere, but you just don't remember</p> <p>13 what the nature of the trip was?</p> <p>14 A That's correct. Unless I look</p> <p>15 at the calendar I can be more explicit.</p> <p>16 Q Do you recall the purpose for</p> <p>17 making a trip after the contract had been</p> <p>18 terminated?</p> <p>19 A To continue gathering the</p> <p>20 information that was sitting and available to</p> <p>21 us to retrieve.</p> <p>22 But these things had to be done</p> <p>23 face-to-face, not by on the internet.</p> <p>24 MS. CLINE: Would you mark that,</p> <p>25 please.</p>	<p style="text-align: right;">Page 36</p> <p>1 FRENCH WALLOP</p> <p>2 Profit?</p> <p>3 A With Miles Guo, yes. We didn't</p> <p>4 know who Eastern Profit was until the contract</p> <p>5 turned up.</p> <p>6 Q And what were the -- so did you</p> <p>7 have communications with Mr. Guo about Exhibit</p> <p>8 112?</p> <p>9 A Yes.</p> <p>10 Q Describe those, please.</p> <p>11 A Well, we walked him through it</p> <p>12 based on the information that we had after we</p> <p>13 finally got a clean flash drive from Yvette</p> <p>14 Wang on how it would work.</p> <p>15 Because obviously we didn't have</p> <p>16 the 15 fish or the 10 fish names, so we could</p> <p>17 break out how the tracking would work with each</p> <p>18 one of these targets.</p> <p>19 So we didn't have the names, in</p> <p>20 other words, until we had gotten a clean flash</p> <p>21 drive, which was not until, what did I say?</p> <p>22 January 8th of 2018.</p> <p>23 Q Do you remember where you were</p> <p>24 when Strategic Vision walked Mr. Guo through</p> <p>25 Exhibit 112?</p>
<p style="text-align: right;">Page 35</p> <p>1 FRENCH WALLOP</p> <p>2 (The above described document was</p> <p>3 marked Exhibit SV 112 for identification,</p> <p>4 as of this date.)</p> <p>5 Q All right. We have handed you</p> <p>6 what's been marked as Exhibit 112, and the</p> <p>7 first question is just whether you can identify</p> <p>8 the document for us, please?</p> <p>9 A I believe it was one of the</p> <p>10 documents that we used to show, Strategic</p> <p>11 Vision used to show Guo how we would operate</p> <p>12 with each one -- with each specific fish in</p> <p>13 a -- in a sort of graph, so that he could</p> <p>14 understand it more clearly.</p> <p>15 Q Did you put Exhibit 112</p> <p>16 together?</p> <p>17 A No, I did not.</p> <p>18 Q Do you know who did?</p> <p>19 A I believe Michael. Michael and</p> <p>20 I talked about it, and then he put it together.</p> <p>21 Q It was put together before the</p> <p>22 contract was signed?</p> <p>23 A Yes.</p> <p>24 Q Did you use, did Strategic</p> <p>25 Vision use Exhibit 8 in a meeting with Eastern</p>	<p style="text-align: right;">Page 37</p> <p>1 FRENCH WALLOP</p> <p>2 A I do not.</p> <p>3 Q Do you remember when the meeting</p> <p>4 was?</p> <p>5 A Well, if we meet with Guo, it</p> <p>6 would have been in his apartment.</p> <p>7 Q And --</p> <p>8 A And I'm not sure which meeting</p> <p>9 it was, it might have been December.</p> <p>10 Sorry.</p> <p>11 Q I was confused by your testimony</p> <p>12 on this.</p> <p>13 A I'm confused actually right now.</p> <p>14 I think -- I think in fact that</p> <p>15 we did talk about it. He had this big file of</p> <p>16 names which he said he had paid \$250 million</p> <p>17 for, with all of these same names and</p> <p>18 photographs and everything else that he showed</p> <p>19 us early on.</p> <p>20 Which, if I go back to my</p> <p>21 calendar, I think that could have been either</p> <p>22 the 4th of December or the -- sorry, or the</p> <p>23 11th of December.</p> <p>24 It looks like maybe the 11th of</p> <p>25 December, because it shows I had put here</p>

10 (Pages 34 - 37)

<p style="text-align: right;">Page 38</p> <p>1 FRENCH WALLOP</p> <p>2 Lianchao, Michael, myself, in New York, with</p> <p>3 new targets.</p> <p>4 So these may have been the new</p> <p>5 targets that we were talking about, and Mike</p> <p>6 may have, after that meeting, put together the</p> <p>7 Power Point.</p> <p>8 Yes, here it is, the Power Point</p> <p>9 for the 21st of December, when we were back in</p> <p>10 New York, and that's when I think these were</p> <p>11 done.</p> <p>12 I honestly cannot tell you which</p> <p>13 meeting, but that makes sense that it would</p> <p>14 have been on the 21st where we did a Power</p> <p>15 Point. I don't know.</p> <p>16 You have to understand, Guo's --</p> <p>17 Guo's intention initially with us was to buy</p> <p>18 real estate in Washington and to buy a great</p> <p>19 big office building across from the White House</p> <p>20 and buy a great big mansion in Georgetown.</p> <p>21 That was the initial.</p> <p>22 MR. GREIM: I would just instruct</p> <p>23 the witness to make sure you answer</p> <p>24 counsel's questions.</p> <p>25 THE WITNESS: Sorry, it's just I</p>	<p style="text-align: right;">Page 40</p> <p>1 FRENCH WALLOP</p> <p>2 A Yes.</p> <p>3 Q Why was it important to note</p> <p>4 that he was talking about a foundation?</p> <p>5 A Because that was part of the</p> <p>6 notes. If you go back and look at Michael</p> <p>7 Waller's notes, you will see they are far more</p> <p>8 explicit than my notes in my calendar.</p> <p>9 Q It's all right. I just have one</p> <p>10 follow up on January 5th, if you go back to</p> <p>11 that.</p> <p>12 A Yes.</p> <p>13 Q Says "bad flash drives." Did</p> <p>14 you discover on January 5th that you thought</p> <p>15 they were bad?</p> <p>16 A Yes.</p> <p>17 Q How did you discover that?</p> <p>18 A Well, she was in my library, I</p> <p>19 had an old laptop, I put them in -- I put them</p> <p>20 in my laptop, I put one in my laptop, and it</p> <p>21 just blew up the screen.</p> <p>22 I was not happy about that, as</p> <p>23 she well knows.</p> <p>24 I said well there is something</p> <p>25 either very much the matter with this flash</p>
<p style="text-align: right;">Page 39</p> <p>1 FRENCH WALLOP</p> <p>2 can't remember each meeting.</p> <p>3 Thank you.</p> <p>4 Q So, do you think Exhibit 112 was</p> <p>5 discussed at the meeting on December 21st where</p> <p>6 the calendar entry says "Power Point"?</p> <p>7 A I believe so; and I think you</p> <p>8 would have to ask Michael that question.</p> <p>9 Q Were there other meetings at</p> <p>10 which Power Points were presented?</p> <p>11 A You would have to ask Michael</p> <p>12 that question.</p> <p>13 Q Do you know what, on the entry</p> <p>14 on December 21st says, I think it says,</p> <p>15 RE/FNDA," do you see that?</p> <p>16 A Yes.</p> <p>17 Q What does that mean?</p> <p>18 A It means regarding foundation,</p> <p>19 regarding a foundation, he was talking about</p> <p>20 putting a foundation together.</p> <p>21 Looks like Yvette was there,</p> <p>22 too, I have a Y there.</p> <p>23 Q And your testimony is you put</p> <p>24 that calendar entry on the calendar on December</p> <p>25 21st?</p>	<p style="text-align: right;">Page 41</p> <p>1 FRENCH WALLOP</p> <p>2 drive, this USB, I want to have somebody check</p> <p>3 it.</p> <p>4 So I called a friend, a</p> <p>5 neighbor, and asked him if he would mind</p> <p>6 testing it in his one of his many computers, he</p> <p>7 said sure, fine.</p> <p>8 I left my son sitting in the</p> <p>9 library with Yvette and I went to the</p> <p>10 neighbor's and we put it in and it did the same</p> <p>11 thing to three of his screens.</p> <p>12 Q And so this meeting on January</p> <p>13 5th, when you put the flash drive into your</p> <p>14 laptop and the screen blew up, was Yvette</p> <p>15 present for that?</p> <p>16 A Yes, she was. She saw it.</p> <p>17 Q She saw your screen?</p> <p>18 A Of course she saw it.</p> <p>19 Q Was your son present?</p> <p>20 A No, he was not, he was not part</p> <p>21 of this.</p> <p>22 Q And then after that you asked</p> <p>23 Eastern Profit to deliver a new flash drives,</p> <p>24 and you got those on January 8th, is that</p> <p>25 right?</p>

Page 42

1 FRENCH WALLOP

2 A Yes, I came up to New York in a

3 snow storm and to the Pierre and met Yvette in

4 the Pierre lobby.

5 Q Just, there is a New York on

6 January 8th, what's the abbreviation before

7 that?

8 A Me, FW.

9 Q You refer to yourself in the

10 third person?

11 A Sometimes. FW New York, you

12 will see on here.

13 MW, FW, you will see many things

14 MW, FW.

15 Q So going back to Exhibit 112 --

16 A Yes.

17 Q -- just, fish means what?

18 A It was the term we used to

19 identify and tag each person that was in -- on

20 the list of people that Guo wanted to have

21 researched.

22 Q And what does unit mean?

23 A 23 units. Well, it was a very

24 complex way we were trying to set it up, so

25 that we could put fish in and take fish out at

Page 43

1 FRENCH WALLOP

2 the same time if they were not -- if the

3 information wasn't retrievable, if it wasn't

4 acceptable.

5 Either to Guo, in other words,

6 if it was just superficial information versus

7 really some good deep dives.

8 Q So, in the first scenario in

9 Exhibit 112 --

10 A Yes.

11 Q -- it contemplates a flat number

12 of fish, but not always 30 units, right?

13 A That's correct. And I think

14 that the 30 units 10, 10, and 10 makes the 30,

15 right, for 10 fish?

16 So we were looking at each

17 individual cell to see which ones we could dive

18 for certain information on in each one of these

19 cells.

20 And some of the cells were not

21 relevant or were not -- the information was not

22 there because they were either fake or the

23 names were wrong or whatever.

24 Q And in the scenario, in this

25 scenario on this first page, the Strategic

Page 44

1 FRENCH WALLOP

2 Vision says, "The unpredictable work in

3 pricing."

4 Do you see that?

5 A Yes.

6 Q That's the pricing is

7 unpredictable because the number of units

8 wasn't steady, correct?

9 A That's correct.

10 Q So the pricing was based per

11 unit, correct?

12 A Yes.

13 Q And then, if you go to the

14 second page of the same exhibit, if there are

15 always 30 units, then the pricing is

16 predictable, right?

17 A I guess so.

18 Again, this is a question for

19 Mike, because we tossed this thing back and

20 forth about ten times, discussing how the best

21 way would be for the tracking research to be

22 done.

23 That's a question also for him.

24 Q I might have gotten that one

25 wrong. I thought it was a question for you.

Page 45

1 FRENCH WALLOP

2 MR. GREIM: Actually, I will tell

3 you, we actually did say that this

4 document was for Ms. Wallop, but some of

5 the questions you are raising are going

6 back to contractual things that, as you

7 are asking the witness, she's saying

8 it's better for Mr. Waller.

9 So we did our best to try to find,

10 to try to divide these documents up and --

11 MS. CLINE: Yeah, well, we will

12 see how it goes. I would have asked him

13 about this had you designated it as

14 such.

15 MR. GREIM: Well, all right, I

16 guess if we have exhausted this witness

17 and there are some questions about the

18 document itself that we still need, then

19 we have got him here.

20 We can, I hate to do this, but

21 maybe we can put him back on at the end to

22 ask whatever the questions are.

23 I just want to know what those are,

24 to be clear, what it is that Ms. Wallop

25 isn't able to say about the document

<p style="text-align: right;">Page 46</p> <p>1 FRENCH WALLOP</p> <p>2 itself.</p> <p>3 I mean, because to be clear, we</p> <p>4 have had a lot of testimony already on</p> <p>5 what the fish were, what the contract</p> <p>6 means, that was all in the first</p> <p>7 deposition.</p> <p>8 I understand this is to be about</p> <p>9 this document --</p> <p>10 MS. CLINE: That's all I'm asking</p> <p>11 about.</p> <p>12 MR. GREIM: We should look at the</p> <p>13 transcript, because it occurs to me a</p> <p>14 lot of the questions are moving into the</p> <p>15 thing about fish and units and pricing,</p> <p>16 which I understand it springs from</p> <p>17 looking at the document, but those are</p> <p>18 questions that actually have been asked</p> <p>19 and answered a long time ago.</p> <p>20 So I don't -- we don't need to have</p> <p>21 a fight about it. Let's just see what the</p> <p>22 questions are about the document itself</p> <p>23 that she can't answer, and if there are</p> <p>24 some, we can put him on to answer those</p> <p>25 questions.</p>	<p style="text-align: right;">Page 48</p> <p>1 FRENCH WALLOP</p> <p>2 fish in the first month, which actually</p> <p>3 unbalanced a lot of our programming as to how</p> <p>4 we were going to process the 10 plus 5 fish,</p> <p>5 making it 15 fish, it made us have to work 33</p> <p>6 percent harder to pull up additional numbers</p> <p>7 when we had only planned originally on the 10</p> <p>8 based on the budget.</p> <p>9 So our ability to walk him</p> <p>10 through what we could pull within a certain</p> <p>11 time frame, if we found that one or two of</p> <p>12 these fish were dead, we would throw them out</p> <p>13 of the tank and replace them with another fish,</p> <p>14 so with another name, and then we would go to</p> <p>15 work on those names to see how much we could</p> <p>16 pull up on those names.</p> <p>17 But it was -- when somebody</p> <p>18 tells you they have got 4,000 names they want</p> <p>19 investigated from the very beginning, we never</p> <p>20 expected to be doing 4,000 names, we expected</p> <p>21 to be able to work with about maybe 100 names</p> <p>22 over the year, over the course of a year.</p> <p>23 That's how we were sort of</p> <p>24 trying to balance out the numbers of the people</p> <p>25 that we were doing the research on based on</p>
<p style="text-align: right;">Page 47</p> <p>1 FRENCH WALLOP</p> <p>2 MS. CLINE: Would you go back to</p> <p>3 the last question I asked.</p> <p>4 (The question requested was read</p> <p>5 back by the reporter.)</p> <p>6 Q So, I'm asking you, when this</p> <p>7 exhibit, this Power Point Exhibit 112 was</p> <p>8 discussed with Mr. Guo, was there a</p> <p>9 conversation around having pricing predictable</p> <p>10 and tied to units?</p> <p>11 A I believe so, yes.</p> <p>12 Q Tell me what you remember about</p> <p>13 that conversation.</p> <p>14 A We discussed -- he needed an</p> <p>15 example as to how this would work.</p> <p>16 So we chose the concept of fish</p> <p>17 in an aquarium, and he understood that.</p> <p>18 So that if we took -- we</p> <p>19 initially were going to take 10 fish, that was</p> <p>20 the deal, we would take 10 fish, the first</p> <p>21 time, the first month, and then see where that</p> <p>22 went.</p> <p>23 If we took the first 10 fish and</p> <p>24 we found that we, out of those 10, which they</p> <p>25 then decided oh, no, we wouldn't to make it 15</p>	<p style="text-align: right;">Page 49</p> <p>1 FRENCH WALLOP</p> <p>2 what it was that he wanted in the way of</p> <p>3 information back.</p> <p>4 So again, it's really a much</p> <p>5 better question for Mike. He's the expert on</p> <p>6 this sort of --</p> <p>7 Q I will ask him if you don't</p> <p>8 know, but predictable pricing, that was</p> <p>9 something Strategic Vision was interested in?</p> <p>10 A Yeah, whatever, yes, predictable</p> <p>11 and unpredictable.</p> <p>12 Q Which?</p> <p>13 A Well, predictable pricing, if</p> <p>14 that's what you're talking about, is that what</p> <p>15 we are on, the 30 units?</p> <p>16 Q Yes.</p> <p>17 A Sorry.</p> <p>18 Q So, let me --</p> <p>19 A One is predictable and one is</p> <p>20 unpredictable.</p> <p>21 Q Let me try it this way, and if</p> <p>22 you don't know, we will ask Mr. Waller, but</p> <p>23 scenario number one entails or would result in</p> <p>24 unpredictable pricing, correct?</p> <p>25 A Correct.</p>

<p style="text-align: right;">Page 50</p> <p>1 FRENCH WALLOP</p> <p>2 Q Scenario number two would result</p> <p>3 in predictable pricing, correct?</p> <p>4 A Correct.</p> <p>5 Q And Strategic Vision was</p> <p>6 interested in predictable pricing?</p> <p>7 A Correct.</p> <p>8 Q In either scenario, the pricing</p> <p>9 would be tied to the units?</p> <p>10 MR. GREIM: Objection, vague as</p> <p>11 to time period.</p> <p>12 Q When this document -- when you</p> <p>13 were in the meeting talking about this</p> <p>14 document, the idea was that pricing would be</p> <p>15 tied to units?</p> <p>16 A My understanding, that's</p> <p>17 correct.</p> <p>18 MS. CLINE: Let's go off the</p> <p>19 record.</p> <p>20 THE VIDEOGRAPHER: The time is</p> <p>21 2:46. We are off the record.</p> <p>22 (At this point in the proceedings</p> <p>23 there was a recess, after which the</p> <p>24 deposition continued as follows:)</p> <p>25 THE VIDEOGRAPHER: The time is</p>	<p style="text-align: right;">Page 52</p> <p>1 FRENCH WALLOP</p> <p>2 on the first page of Exhibit 113 relate to</p> <p>3 the -- correspond to the color coding in</p> <p>4 Exhibit 114?</p> <p>5 A Yes, it does.</p> <p>6 Q You put these two exhibits</p> <p>7 together?</p> <p>8 A I did.</p> <p>9 Q Tell us what was the purpose of</p> <p>10 these exhibits?</p> <p>11 A Well, it was to show that was</p> <p>12 allocated -- the green, which shows the</p> <p>13 allocated amount to myself, since it's an LLC,</p> <p>14 that's one and the same, Strategic Vision</p> <p>15 business deductions and travel and research,</p> <p>16 miscellaneous, is the yellow.</p> <p>17 And then the wires out is orange</p> <p>18 or red, looks like you've got here.</p> <p>19 Q Just say a bit more, if you</p> <p>20 would, about what you mean by the FCW allotted</p> <p>21 amounts.</p> <p>22 A Yes.</p> <p>23 Q So those are -- are those</p> <p>24 personal expenditures?</p> <p>25 A They are not expenditures, they</p>
<p style="text-align: right;">Page 51</p> <p>1 FRENCH WALLOP</p> <p>2 2:54 p.m. We are back on the record.</p> <p>3 MS. CLINE: Could you please mark</p> <p>4 this as the next exhibit.</p> <p>5 (The above described document was</p> <p>6 marked Exhibit SV 113 for identification</p> <p>7 as of this date.)</p> <p>8 MS. CLINE: ,And 114 as well.</p> <p>9 (The above described document was</p> <p>10 marked Exhibit SV 114 for identification</p> <p>11 as of this date.)</p> <p>12 Q Okay. We have handed you what</p> <p>13 have been marked as Exhibits 113 and 114, and</p> <p>14 my first question is just to ask you to</p> <p>15 identify them for the record.</p> <p>16 A Exhibit 113 is my color table</p> <p>17 for expenditures and payments to Strategic</p> <p>18 Vision U.S. which also shows wires out to</p> <p>19 vendors.</p> <p>20 And the other exhibit is,</p> <p>21 Strategic Vision 114, which is a Citibank</p> <p>22 Business Strategic Vision U.S., LLC bank</p> <p>23 statement from January 1, 2018 through January</p> <p>24 31, 2019.</p> <p>25 Q Do the -- does the color table</p>	<p style="text-align: right;">Page 53</p> <p>1 FRENCH WALLOP</p> <p>2 were -- Mike and I decided what we would -- how</p> <p>3 we would divide the account based on our time</p> <p>4 and -- being put into this project.</p> <p>5 And so Mike got \$250,000 wired</p> <p>6 out and I got -- I left \$250,000 in the</p> <p>7 account, and I drew down on that amount, which</p> <p>8 is how you will see that calculated in the</p> <p>9 first green column, so to speak, throughout the</p> <p>10 next 12 pages.</p> <p>11 Q So, you and Mr. Waller</p> <p>12 individually each received \$250,000 from the</p> <p>13 Eastern Profit transaction?</p> <p>14 A Correct.</p> <p>15 Q And when did you decide, when</p> <p>16 did Strategic Vision decide that each of you</p> <p>17 would get \$250,000?</p> <p>18 A Probably within the first --</p> <p>19 after the contract was signed and we had sort</p> <p>20 of begun to allocate some of the initial costs.</p> <p>21 So I would say it would probably</p> <p>22 be around the, I don't know, 10th -- 10th, 12th</p> <p>23 of January 2018.</p> <p>24 Q And so in -- was that the</p> <p>25 agreement -- you were here when Mr. Waller was</p>

14 (Pages 50 - 53)

Page 54

1 FRENCH WALLOP
2 testifying, right?
3 A Yes.
4 Q And he referred to an agreement
5 to split earnings. Do you recall that
6 testimony?
7 A Yes. I wouldn't call it
8 earnings, but it depends upon how you define
9 it, I guess.
10 They were -- that was the amount
11 that we allocated to ourselves.
12 Q What would you call it? There
13 has been some prior testimony about splitting
14 of profits. Is that more accurate?
15 A These are not profits, this was
16 for our time allocated to this project and how
17 much time it would take between travel and
18 setting up the teams and so forth as to what
19 our costs would be.
20 Q So, neither of you is an
21 employee of Strategic Vision, right?
22 A That's correct.
23 Q But the \$250,000 apiece was
24 compensation?
25 A Yes.

Page 55

1 FRENCH WALLOP
2 Q And did Strategic Vision then
3 issue a K-1?
4 A No.
5 Q Did Strategic Vision issue any
6 tax form to either of you in connection with
7 the \$250,000?
8 A No, because it's an LLC and he
9 was paid directly into Georgetown Research, and
10 I left the funds in the account and drew down
11 on what I would call my portion of those.
12 Q When did Strategic Vision pay
13 Mr. Waller his \$250,000?
14 A Just looking at the January, it
15 looks like it was the 16th of January.
16 I'm sorry, I'm not sure, I take
17 that back. It was either the 12th or the 16th;
18 I think it was the 12th of January.
19 Q So the way, if I am following
20 correctly, the way that Strategic Vision made
21 the payment to Mr. Waller was that Strategic
22 Vision wired money to Georgetown Research and
23 then Mr. Waller withdrew it from Georgetown
24 Research?
25 A Yes.

Page 56

1 FRENCH WALLOP
2 Q On the 16th your calendar entry
3 makes reference to a \$200 --
4 A \$200,000.
5 Q And then a \$25,000 wire?
6 A That's correct.
7 Q Was there -- did there come a
8 time in which another \$25,000 was wired?
9 A I believe how it worked was that
10 I wired out on the 12th to Psyber Solutions
11 \$200,000, on the 12th.
12 And if you look under that, it
13 says "Citibank setup for GRG," which is
14 Georgetown Research.
15 And then on the Monday, on the
16 Monday, the 16th, I wired out to GRG another
17 \$200,000 plus \$25,000 in expenses, and I think
18 that went to Team 1, and then Mike was going to
19 dispatch that or disburse that.
20 I may have gotten the two
21 accounts mixed up, but pretty much they are the
22 same amount, so --
23 Q Now, I'm looking at your
24 calendar entry, so on the 12th, where it says
25 "wire out to," is that "PS, 200"?

Page 57

1 FRENCH WALLOP
2 A Psyber Solutions. 200.
3 Q Is that a P? I'm just asking a
4 handwriting question right now, is that a P and
5 S?
6 A Yes, sorry.
7 Q How does one spell Psyber?
8 A P-s-y.
9 Well, and it's -- that's how he
10 spells it.
11 Q And who is Psyber Solutions?
12 A That's one of Michael's LLCs.
13 Q And that one, Psyber Solutions,
14 is owned exclusively by Mr. Waller?
15 A Yes.
16 Q So, this is a general question,
17 so Strategic Vision made payment --
18 MS. CLINE: Let me start over.
19 Q I am trying to figure out to how
20 many of Mr. Waller's entities Strategic Vision
21 made payment to.
22 So, Strategic Vision made a
23 payment -- made payments to Georgetown
24 Research, is that right?
25 A That's correct.

<p style="text-align: right;">Page 58</p> <p>1 FRENCH WALLOP</p> <p>2 Q And that entity is jointly owned</p> <p>3 by both of you?</p> <p>4 A It is, but it's really</p> <p>5 Michael's. I don't have any access to it or --</p> <p>6 no.</p> <p>7 Q Do you have any ownership</p> <p>8 interest in Georgetown Research?</p> <p>9 A No, no. Not that I know of.</p> <p>10 Q From your perspective, it's 100</p> <p>11 percent owned by Mr. Waller?</p> <p>12 A Yes.</p> <p>13 Q And Psyber Solutions is also 100</p> <p>14 percent owned by Mr. Waller?</p> <p>15 A I believe so. You would have to</p> <p>16 ask him.</p> <p>17 Q What was the --</p> <p>18 MS. CLINE: Strike that, we will</p> <p>19 get there in a second.</p> <p>20 Q Are you aware of any other LLCs</p> <p>21 owned by Mr. Waller to which Strategic Vision</p> <p>22 made payment?</p> <p>23 A No.</p> <p>24 Q So, if you could look, please,</p> <p>25 at Exhibit 113, your color table.</p>	<p style="text-align: right;">Page 60</p> <p>1 FRENCH WALLOP</p> <p>2 business expenses, and in the orange column,</p> <p>3 those were the wires out to different entities,</p> <p>4 relating obviously to the Team 1 and Team 2 and</p> <p>5 so forth, or just Team 1.</p> <p>6 Q Were the business expenses in --</p> <p>7 that are reflected in Exhibit 113, were those</p> <p>8 solely related to the Eastern Profit matter?</p> <p>9 A Yes.</p> <p>10 Well, yes, and business expenses</p> <p>11 in running the business. That would have</p> <p>12 correlated with the expenses in order to</p> <p>13 collect the information that we were looking</p> <p>14 for, plus running the business.</p> <p>15 Q All right. So let's go back now</p> <p>16 and focus only on the color code red, the wires</p> <p>17 out.</p> <p>18 A Okay.</p> <p>19 Q In Exhibit 113.</p> <p>20 A Yes.</p> <p>21 Q So, if I am following you, then,</p> <p>22 what you did in Exhibit 113 with respect to the</p> <p>23 column all the way on the right that is color</p> <p>24 coded in red is just to record all of the wires</p> <p>25 that were delineated in the bank statement</p>
<p style="text-align: right;">Page 59</p> <p>1 FRENCH WALLOP</p> <p>2 A Um-hum.</p> <p>3 Q For now I'm just going to focus</p> <p>4 on the red entries, the wires out.</p> <p>5 A Yes.</p> <p>6 Q So, if I am -- well, could you</p> <p>7 tell me a little bit about how Exhibit 113 is</p> <p>8 set up, what are the columns and how did you</p> <p>9 organize this exhibit?</p> <p>10 A Well, I thought it was the</p> <p>11 clearest way of being able to show as a direct</p> <p>12 correlation to the actual bank statement.</p> <p>13 So the whole full bank statement</p> <p>14 was there for -- of Strategic Vision.</p> <p>15 So I went through the bank</p> <p>16 statement and highlighted all of the ones that</p> <p>17 were what I call personal -- personal, and I</p> <p>18 don't want to use the word expenses, because</p> <p>19 they weren't, they were personal compensation,</p> <p>20 which fell into the \$250,000 that I had</p> <p>21 allotted to myself, okay?</p> <p>22 So I went through and I</p> <p>23 highlighted all of those green ones, which were</p> <p>24 part of that column.</p> <p>25 In the yellow column were</p>	<p style="text-align: right;">Page 61</p> <p>1 FRENCH WALLOP</p> <p>2 that's Exhibit 114?</p> <p>3 A That's correct.</p> <p>4 Q So, starting with page the</p> <p>5 second page of the exhibit, of Exhibit 113,</p> <p>6 there are four wires that are mentioned there,</p> <p>7 right?</p> <p>8 A That's correct.</p> <p>9 Q Okay. The first one, does that</p> <p>10 say "Hill invoice"?</p> <p>11 A Yes.</p> <p>12 Q What is Hill?</p> <p>13 A That is part of Team 1.</p> <p>14 Q So -- and then, if I can get you</p> <p>15 to sort of simultaneously at Exhibit 114 as</p> <p>16 well, if you turn to the second page of Exhibit</p> <p>17 114.</p> <p>18 A Yes.</p> <p>19 Q The first red entry is a, or</p> <p>20 entry highlighted in red is a \$50,000 debit, is</p> <p>21 that right?</p> <p>22 A That's correct.</p> <p>23 Q Does that correspond to the Hill</p> <p>24 invoice recorded on Exhibit 113?</p> <p>25 A Yes.</p>

<p style="text-align: right;">Page 62</p> <p>1 FRENCH WALLOP</p> <p>2 Q And then the \$200,000 entry on</p> <p>3 Exhibit 113 says "Psyber Sol, that's also</p> <p>4 reflected on page 2 of 114, correct?</p> <p>5 A Yes.</p> <p>6 Q And then there are two more red</p> <p>7 highlights on page 2 of Exhibit 114, and those</p> <p>8 are respectively a \$25,000 wire to Georgetown</p> <p>9 Research and a \$200,000 wire to Georgetown</p> <p>10 Research?</p> <p>11 A Yes.</p> <p>12 Q So Strategic Vision in early</p> <p>13 January wired \$425,000 to entities controlled</p> <p>14 by Mr. Waller, is that right?</p> <p>15 A Yes, to pay vendors that we were</p> <p>16 subcontracting to.</p> <p>17 We were trying to keep this as,</p> <p>18 despite the fact that we had gotten the wire</p> <p>19 from ACA Hong Kong, which we asked not to have</p> <p>20 it done that way, we were still trying to keep</p> <p>21 this as compartmentalized as possible.</p> <p>22 Q Do you know, or does Strategic</p> <p>23 Vision know --</p> <p>24 MS. CLINE: Strike that.</p> <p>25 Q Was it Psyber Sol or Georgetown</p>	<p style="text-align: right;">Page 64</p> <p>1 FRENCH WALLOP</p> <p>2 A And I drew down on it, yes.</p> <p>3 Q How did Strategic Vision</p> <p>4 distribute to Mr. Waller his \$250,000?</p> <p>5 A Right here.</p> <p>6 Q To which one?</p> <p>7 A I'm not sure, that's why I am</p> <p>8 saying you will have to just ask him which one.</p> <p>9 I'm not privy to his invoices,</p> <p>10 or, I know what he paid out, but I don't know</p> <p>11 which account he paid it out from.</p> <p>12 MR. GREIM: Counsel, perhaps I</p> <p>13 tried to draw too sharp of a line here,</p> <p>14 but we will just simply -- we can put</p> <p>15 him back on here and you can ask</p> <p>16 whatever you need to about where those</p> <p>17 wires went.</p> <p>18 We will leave here with an answer</p> <p>19 today.</p> <p>20 MS. CLINE: I appreciate it.</p> <p>21 Q Okay, let's just continue with</p> <p>22 the, I am only interested in the wires column</p> <p>23 on Exhibit 113.</p> <p>24 A Correct.</p> <p>25 Q So at the bottom of page 2, you</p>
<p style="text-align: right;">Page 63</p> <p>1 FRENCH WALLOP</p> <p>2 Research or both through which Mr. Waller would</p> <p>3 make payments to subcontractors?</p> <p>4 A I don't know, we would have to</p> <p>5 ask him. I believe -- I don't know. I think</p> <p>6 it's better for him to answer that.</p> <p>7 Q Well, do you know whether the</p> <p>8 money that was wired to Psyber Sol, Mr. Waller</p> <p>9 treated as part of his personal compensation?</p> <p>10 A No, I don't believe that -- I</p> <p>11 think that was part of the overall invoice out</p> <p>12 to Team 1.</p> <p>13 Q So you think Psyber Sol made</p> <p>14 some payment to Team 1?</p> <p>15 A I think they made all of those</p> <p>16 payments to Team 1. In other words I think it</p> <p>17 was \$200,000, \$250,000, yes, to Team 1.</p> <p>18 Q Then is it your understanding,</p> <p>19 I'm trying to understand -- Mr. Waller and you</p> <p>20 agreed that each of you would receive \$250,000?</p> <p>21 A That's correct.</p> <p>22 Q And the way you received your</p> <p>23 money was that it just -- you let it remain in</p> <p>24 the Strategic Vision account and you used it</p> <p>25 for personal expenditures, right?</p>	<p style="text-align: right;">Page 65</p> <p>1 FRENCH WALLOP</p> <p>2 just, as I understand it, you basically just</p> <p>3 tally up all of the wires?</p> <p>4 A That's correct.</p> <p>5 Q Then go to the next page, if you</p> <p>6 would, and again, focusing only on the wires</p> <p>7 out column, can you describe what you have</p> <p>8 recorded there?</p> <p>9 A There are no wires out for that</p> <p>10 month or that -- yes, for that month.</p> <p>11 Q Okay. And what's the arithmetic</p> <p>12 at the top right-hand corner of the page there?</p> <p>13 A Essentially \$475,000 from the</p> <p>14 previous month wires out, and if you took the</p> <p>15 \$134,000 over on the left-hand column --</p> <p>16 Q Um-hum.</p> <p>17 A -- and also the business</p> <p>18 expense, \$5,800, you ended up showing a balance</p> <p>19 or you ended up showing that it was \$615,000</p> <p>20 that had been essentially taken out of the</p> <p>21 account in January, or, not taken out, in my</p> <p>22 case I left mine in.</p> <p>23 So, it left a balance that we</p> <p>24 were working with of \$384,475.98.</p> <p>25 Then if you go down the bottom</p>

<p style="text-align: right;">Page 66</p> <p>1 FRENCH WALLOP</p> <p>2 of that column, it will show the \$384,000 less</p> <p>3 \$9,090.66, where I had taken, again, I had</p> <p>4 taken that out of my \$250,000; if you look over</p> <p>5 there on the left.</p> <p>6 Q Okay, let's keep going with the</p> <p>7 wires out column.</p> <p>8 A Yeah, yeah, then the wires out,</p> <p>9 then we get further on, in May, next set of</p> <p>10 wires out.</p> <p>11 Q Yes, so until the beginning of</p> <p>12 May the total amount of wires out was \$475,000,</p> <p>13 right?</p> <p>14 A That's correct, but did not</p> <p>15 include my compensation.</p> <p>16 Q Okay.</p> <p>17 And then what are the wires out</p> <p>18 in May?</p> <p>19 A Wires out in May, \$17,686.69,</p> <p>20 and another one for \$15,000.</p> <p>21 Q What are each of those, what is</p> <p>22 the purpose?</p> <p>23 A The U.K. one was part of our</p> <p>24 research in London for Fletcher, which you</p> <p>25 have.</p>	<p style="text-align: right;">Page 68</p> <p>1 FRENCH WALLOP</p> <p>2 So I would have presumed they</p> <p>3 provided it in May, because I saw them in</p> <p>4 February to do the investigation on them.</p> <p>5 Q And when did Strategic Vision</p> <p>6 retain Fletcher to --</p> <p>7 A In February, early February, I</p> <p>8 think, mid-February.</p> <p>9 Q Then after Strategic Vision</p> <p>10 received the termination notice from Eastern</p> <p>11 Profit, did it take any means to cancel the</p> <p>12 contract with --</p> <p>13 MS. CLINE: Well, strike that.</p> <p>14 Q Was there a contract between</p> <p>15 Strategic Vision and Fletcher?</p> <p>16 A It was a verbal contract.</p> <p>17 Q And what were the terms of the</p> <p>18 verbal contract?</p> <p>19 A He quoted me a price, he told me</p> <p>20 what he thought he could get, and I agreed to</p> <p>21 him, his price.</p> <p>22 Q After -- and was his price 3,000</p> <p>23 pounds?</p> <p>24 A No, it was \$17,000.</p> <p>25 MS. CLINE: Let's mark this.</p>
<p style="text-align: right;">Page 67</p> <p>1 FRENCH WALLOP</p> <p>2 Those are three of the fish, I</p> <p>3 believe, two or three of the fish.</p> <p>4 Q Okay, Fletcher was a separate</p> <p>5 entity that --</p> <p>6 A It wasn't Team 1, it wasn't Team</p> <p>7 2, it was a separate entity.</p> <p>8 Q And what did they do?</p> <p>9 A They do investigative research?</p> <p>10 Since the people were based in the U.K., we</p> <p>11 wanted to see what they could pull up for -- on</p> <p>12 them.</p> <p>13 Q And did Fletcher ever deliver a</p> <p>14 work product to you?</p> <p>15 A Yes.</p> <p>16 Q What was that?</p> <p>17 A You have it.</p> <p>18 Q Could you describe it?</p> <p>19 A It was a report on the people</p> <p>20 that were investigated, researched.</p> <p>21 Q And when did they provide that</p> <p>22 to you, to Strategic Vision?</p> <p>23 A So, they provided it in -- I</p> <p>24 don't know when the bill came, but whenever the</p> <p>25 bill came, I usually paid it pretty quickly.</p>	<p style="text-align: right;">Page 69</p> <p>1 FRENCH WALLOP</p> <p>2 (The above described document was</p> <p>3 marked Exhibit SV 115 for identification</p> <p>4 as of this date.)</p> <p>5 Q So, could you identify Exhibit</p> <p>6 115, please?</p> <p>7 A Exhibit 115 is a bill by</p> <p>8 Fletcher for their research, and it is in the</p> <p>9 amount of 13,000 pounds, which at the time</p> <p>10 equaled \$17,686.69.</p> <p>11 It was paid on the 1st of May,</p> <p>12 2018.</p> <p>13 Q And just to make sure I'm</p> <p>14 understanding this correctly, in terms of the</p> <p>15 breakdown of their invoice, 3,000 pounds was</p> <p>16 for research and consultancy services, correct?</p> <p>17 A I don't know how they did their</p> <p>18 invoices; we just agreed to the number.</p> <p>19 Q So you don't recall a specific</p> <p>20 breakdown, you just agreed to --</p> <p>21 A I don't know how he does his</p> <p>22 invoices. When I saw the invoice it was the</p> <p>23 number I had agreed to, and I keep my word,</p> <p>24 so --</p> <p>25 Q When Strategic Vision received</p>

18 (Pages 66 - 69)

<p style="text-align: right;">Page 70</p> <p>1 FRENCH WALLOP</p> <p>2 the termination notice from Eastern Profit, did</p> <p>3 it reach out to Fletcher and let it know about</p> <p>4 the termination?</p> <p>5 A No, because it was already in</p> <p>6 progress.</p> <p>7 Q Well --</p> <p>8 A In February.</p> <p>9 Q Some of the amounts paid to</p> <p>10 Fletcher were for disbursements, including</p> <p>11 travel, right?</p> <p>12 A I don't know, you will have to</p> <p>13 ask them.</p> <p>14 Q Did you ever say, did Strategic</p> <p>15 Vision ever have a conversation with Fletcher</p> <p>16 to the effect that they shouldn't incur any</p> <p>17 more fees because the contract had been</p> <p>18 cancelled?</p> <p>19 A No.</p> <p>20 Q Why not?</p> <p>21 MR. GREIM: Objection,</p> <p>22 foundation.</p> <p>23 You can answer if you understand</p> <p>24 the question.</p> <p>25 A I don't understand the question.</p>	<p style="text-align: right;">Page 72</p> <p>1 FRENCH WALLOP</p> <p>2 produced the report.</p> <p>3 And so if anybody was saying</p> <p>4 that we were not producing reports, they did</p> <p>5 not, again, know what they were talking about.</p> <p>6 We were producing reports and we</p> <p>7 were paying for reports.</p> <p>8 Q So Strategic Vision -- is there</p> <p>9 any evidence that you are aware of that</p> <p>10 Strategic Vision did anything to mitigate its</p> <p>11 damages with respect to Fletcher?</p> <p>12 MR. GREIM: Objection, calls for</p> <p>13 a legal conclusion, and foundation.</p> <p>14 A I have no way of understanding</p> <p>15 how to answer that question.</p> <p>16 MS. CLINE: Can I just</p> <p>17 understand, Eddie, the basis for the</p> <p>18 foundation objection?</p> <p>19 MR. GREIM: Sure, I am happy.</p> <p>20 It's a bit of an explanation, but</p> <p>21 under the contract there is a 30 day</p> <p>22 notice of termination.</p> <p>23 So the notice of termination is</p> <p>24 given, it must be given 30 days before the</p> <p>25 end of the contract.</p>
<p style="text-align: right;">Page 71</p> <p>1 FRENCH WALLOP</p> <p>2 How about that?</p> <p>3 Q Who from Strategic Vision</p> <p>4 reached the oral agreement with Fletcher?</p> <p>5 A I did.</p> <p>6 Q You did?</p> <p>7 A Yes.</p> <p>8 Q So perhaps you have a foundation</p> <p>9 to answer the question.</p> <p>10 So, then --</p> <p>11 A I love humor, it's so helpful.</p> <p>12 Q Why didn't Strategic Vision, and</p> <p>13 specifically you, as the representative who</p> <p>14 negotiated the arrangement, tell them to stop</p> <p>15 incurring fees because the reason for the</p> <p>16 arrangement you had made with them no longer</p> <p>17 existed?</p> <p>18 MR. GREIM: Objection, compound</p> <p>19 question, and foundation.</p> <p>20 A Because I had contracted them in</p> <p>21 February, they were working on it. I'm not</p> <p>22 going to stop them. Maybe the bill was going</p> <p>23 to be a lot more. Who knows?</p> <p>24 But bottom line was I agreed to</p> <p>25 this number, they did the research, they</p>	<p style="text-align: right;">Page 73</p> <p>1 FRENCH WALLOP</p> <p>2 So in those 30 days, other work is</p> <p>3 going to be done.</p> <p>4 I mean, our theory, as you know, is</p> <p>5 there is a set fee for certain periods,</p> <p>6 and so it would not make any sense to call</p> <p>7 and stop the work, you actually would need</p> <p>8 to finish the work over that time period.</p> <p>9 So all of your questions assume</p> <p>10 that it's a different situation, and you</p> <p>11 haven't laid, the proper way to say it is</p> <p>12 you haven't laid the foundation for the</p> <p>13 work that you are trying to describe to</p> <p>14 the witness. So I am just preserving the</p> <p>15 objection.</p> <p>16 You can ask her facts, see what you</p> <p>17 can get. I will say we have moved a</p> <p>18 little beyond understanding the document,</p> <p>19 we are going back and circling through the</p> <p>20 same topics from the first deposition.</p> <p>21 But go ahead and do your best.</p> <p>22 MS. CLINE: Yes, she's the</p> <p>23 damages witness, or at least she was,</p> <p>24 and maybe only now she's the, partially</p> <p>25 the damages witness.</p>

<p style="text-align: right;">Page 74</p> <p>1 FRENCH WALLOP</p> <p>2 I'm just trying to understand why</p> <p>3 there was money wired out to this</p> <p>4 contractor in May for a contract that was</p> <p>5 terminated in February, effective in</p> <p>6 March, so.</p> <p>7 Q So my question to you as the</p> <p>8 person who was the point of contact between</p> <p>9 Strategic Vision and Fletcher is whether you</p> <p>10 ever communicated with Fletcher after the</p> <p>11 inception of your relationship with them to ask</p> <p>12 them to stop incurring fees with respect to the</p> <p>13 Eastern Profit research?</p> <p>14 A I did not, because I had</p> <p>15 contracted with them in February to do the job,</p> <p>16 and they did the job, and I didn't get noticed</p> <p>17 on this lawsuit until sometime at the end of</p> <p>18 February.</p> <p>19 So, it was really clear that if</p> <p>20 you ask somebody to do a transaction and do the</p> <p>21 investigation and you owe them for that amount</p> <p>22 of money, that you owe them for that amount of</p> <p>23 money.</p> <p>24 You don't just not pay them.</p> <p>25 Q What's the \$15,000 wire in May</p>	<p style="text-align: right;">Page 76</p> <p>1 FRENCH WALLOP</p> <p>2 Q And your understanding is that</p> <p>3 was part of his personal compensation?</p> <p>4 A Yes, it was part of the</p> <p>5 \$250,000, the original \$250,000.</p> <p>6 Q Would you turn to, in Exhibit</p> <p>7 114, Bates page number 1924.</p> <p>8 A 114?</p> <p>9 Q Yes, please, Bates 1924.</p> <p>10 A Sorry. Yes, I have it.</p> <p>11 Q And there is a red highlight</p> <p>12 that corresponds to the \$50,000 wire we just</p> <p>13 talked about, is that right?</p> <p>14 A That's correct.</p> <p>15 Q Do you know why Strategic Vision</p> <p>16 redacted out the name of the recipient?</p> <p>17 A I don't. Unless it was the</p> <p>18 account number.</p> <p>19 Q Is there anywhere in Exhibit 113</p> <p>20 where you total up all of the wires out?</p> <p>21 A That's a great question.</p> <p>22 No, there isn't.</p> <p>23 But it's pretty easy to do;</p> <p>24 there are only about five or six wires out, so,</p> <p>25 and they are all in round numbers.</p>
<p style="text-align: right;">Page 75</p> <p>1 FRENCH WALLOP</p> <p>2 to Georgetown Research, what is the purpose for</p> <p>3 that?</p> <p>4 A I think that was to Michael, and</p> <p>5 I think that was either for additional expenses</p> <p>6 or, again, you will have to ask Michael, but I</p> <p>7 think -- I think that's what it was.</p> <p>8 Q Turning to June --</p> <p>9 A Yes.</p> <p>10 Q -- what's that \$50,000 wire?</p> <p>11 A That was to Oceanic, and that</p> <p>12 was \$50,000, and that was to Michael. That was</p> <p>13 part of his \$250,000.</p> <p>14 He had been paid \$200,000 and he</p> <p>15 was owed the additional \$50,000.</p> <p>16 Q So, sorry, I am just trying to</p> <p>17 find the -- what was the name of the entity,</p> <p>18 Oceanic Advisors, do you remember?</p> <p>19 A I don't know. I think so.</p> <p>20 Q But your understanding is the</p> <p>21 wire sent in June of '18 was to an LLC</p> <p>22 controlled by Mr. Waller?</p> <p>23 A Let me just take a look here.</p> <p>24 Yes, I believe it was, I believe it was to</p> <p>25 Oceanic.</p>	<p style="text-align: right;">Page 77</p> <p>1 FRENCH WALLOP</p> <p>2 Q So, approximately \$490,000 of</p> <p>3 the money was wired out to entities controlled</p> <p>4 by Mr. Waller, is that accurate?</p> <p>5 A I think you would have to ask</p> <p>6 Mr. Waller, Dr. Waller. He was disbursing to</p> <p>7 vendors.</p> <p>8 Q All right, let's look at the --</p> <p>9 so, the green column?</p> <p>10 A Yes.</p> <p>11 Q Those are -- Strategic Vision</p> <p>12 isn't claiming items that are in the green</p> <p>13 column as business expenses in connection with</p> <p>14 this litigation?</p> <p>15 A No.</p> <p>16 Q The yellow column is the one</p> <p>17 that relates to Strategic Vision's business</p> <p>18 expenses?</p> <p>19 A Correct.</p> <p>20 Q Sorry, bear with me, I lost my</p> <p>21 place.</p> <p>22 Turn, if you would, to the</p> <p>23 second page of Exhibit 114.</p> <p>24 A Yes.</p> <p>25 Q Now we are focusing on yellow</p>

20 (Pages 74 - 77)

<p style="text-align: right;">Page 78</p> <p>1 FRENCH WALLOP</p> <p>2 entries, Exhibit 114.</p> <p>3 A Yes.</p> <p>4 Q Several entries down there is</p> <p>5 one for a debit of \$2,000, it's an ACH debit.</p> <p>6 Do you see that one?</p> <p>7 A Yes.</p> <p>8 Q January 10th?</p> <p>9 A Yes.</p> <p>10 Q And the memo line says it's for</p> <p>11 payroll services. Do you see that?</p> <p>12 A Yes.</p> <p>13 Q What were the payroll services</p> <p>14 that Strategic Vision was --</p> <p>15 A It's actually a tax deduction, I</p> <p>16 mean it's a set-aside for taxes every month.</p> <p>17 Q For whose taxes?</p> <p>18 A For the -- for the corporate</p> <p>19 taxes or the business taxes, I guess.</p> <p>20 Q So, Strategic Vision?</p> <p>21 A Yes, Strategic Vision.</p> <p>22 Q Strategic Vision filed a tax</p> <p>23 return?</p> <p>24 A Yes -- no, we did not. It falls</p> <p>25 under my own personal tax return.</p>	<p style="text-align: right;">Page 80</p> <p>1 FRENCH WALLOP</p> <p>2 Q What did you ask him?</p> <p>3 A I asked him about business</p> <p>4 expenses versus the personal.</p> <p>5 Q What did he say?</p> <p>6 A He said well, this is the best</p> <p>7 way of sort of setting it out. Unless you are</p> <p>8 going to go through a sort of computer program,</p> <p>9 it's just the easiest visual way for something</p> <p>10 like this to be viewed by an attorney or a law</p> <p>11 firm.</p> <p>12 Q Did you ask him whether the tax</p> <p>13 set-aside to you every month is recordable as a</p> <p>14 business expense?</p> <p>15 A No; I didn't ask.</p> <p>16 Q On the same page we were just</p> <p>17 on, the second page of Exhibit 114, if you go</p> <p>18 down actually on January 10th, there is another</p> <p>19 entry for Hermes. Do you see that?</p> <p>20 A Yes.</p> <p>21 Q That's a business expense?</p> <p>22 A Where is that?</p> <p>23 Q January 10, \$1,315.</p> <p>24 A On the second page?</p> <p>25 Q So, just so we are clear, Bates</p>
<p style="text-align: right;">Page 79</p> <p>1 FRENCH WALLOP</p> <p>2 Q So where did the -- every time</p> <p>3 there is an entry for a \$2,000 payroll --</p> <p>4 A That goes towards the taxes that</p> <p>5 are paid in my tax return for this business</p> <p>6 entity, for income, and it's a tiny -- this is,</p> <p>7 \$24,000 a year is nothing.</p> <p>8 Q So, let me just finish my</p> <p>9 question, though.</p> <p>10 So every time there is a \$2,000</p> <p>11 entry for payroll services, that's essentially</p> <p>12 a payment to you for taxes?</p> <p>13 A Yes, it is. Or a set-aside. It</p> <p>14 doesn't come to my account.</p> <p>15 Q Where does it go?</p> <p>16 A It goes into the ACH account.</p> <p>17 Q Where is that housed?</p> <p>18 A In my accountant's office.</p> <p>19 Q Did you -- did Strategic Vision</p> <p>20 have an accountant?</p> <p>21 A No.</p> <p>22 Q Did you run your table by your</p> <p>23 accountant?</p> <p>24 A No, I just asked him on the</p> <p>25 telephone a couple of questions.</p>	<p style="text-align: right;">Page 81</p> <p>1 FRENCH WALLOP</p> <p>2 1908.</p> <p>3 A 1908. Oh, yes, actually, I know</p> <p>4 it doesn't look like it, but I went through</p> <p>5 that with the green highlighter, you see it's</p> <p>6 not -- it was yellow, then I made it green.</p> <p>7 Q So if you go --</p> <p>8 A It's hard to tell.</p> <p>9 Q Go to Exhibit 113, if you would,</p> <p>10 second page of the Exhibit 113.</p> <p>11 A Okay.</p> <p>12 Q So, in the business expense</p> <p>13 column there is a \$1,315.</p> <p>14 A Yes.</p> <p>15 Q That corresponds to your Hermes</p> <p>16 purchase, right?</p> <p>17 A Yes. Actually, part of that</p> <p>18 was -- part of that, I think, I thought I gave</p> <p>19 something to Yvette, but I can't -- I don't</p> <p>20 think I did. I think I kept it because she was</p> <p>21 so disagreeable.</p> <p>22 So I think it was probably, it</p> <p>23 should go back into my personal one, but you</p> <p>24 see on my -- on my actual bank statement, I did</p> <p>25 go over the green, I did go over the yellow</p>

<p style="text-align: right;">Page 82</p> <p>1 FRENCH WALLOP</p> <p>2 with green and it came out pale green, but I</p> <p>3 didn't do it on my written one.</p> <p>4 So that is a mistake on my part.</p> <p>5 I thought I got that.</p> <p>6 Q Same page, so in Exhibit 113, if</p> <p>7 you kind of scroll down with your finger toward</p> <p>8 the bottom of the page, there is an entry for</p> <p>9 \$206.71. Do you see that?</p> <p>10 A I see it here.</p> <p>11 Q And then if you track over to</p> <p>12 the bank statements, there is a corresponding</p> <p>13 entry to Tumi Stores?</p> <p>14 A Yes, that was for a briefcase.</p> <p>15 Q For whom?</p> <p>16 A Me.</p> <p>17 Q So in this case are you asking,</p> <p>18 is Strategic Vision asking Eastern Profit to</p> <p>19 pay for your briefcase?</p> <p>20 A It's a business expense.</p> <p>21 Q So the answer is yes?</p> <p>22 A Yes.</p> <p>23 Q So, in the bank statement,</p> <p>24 Exhibit 114, turn, if you would, to page 1912.</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 84</p> <p>1 FRENCH WALLOP</p> <p>2 debit over \$1,500, right?</p> <p>3 A Yes.</p> <p>4 Q What's the business purpose of</p> <p>5 the Bloomingdale's expense?</p> <p>6 A Probably a coat.</p> <p>7 Q A coat. So your damages in this</p> <p>8 case, Strategic Vision expects Eastern Profit</p> <p>9 to pay for your coat?</p> <p>10 A It's not Eastern Profit, it's</p> <p>11 ACA, right? That's who paid for it, not -- we</p> <p>12 need to straighten that out.</p> <p>13 It is not Eastern Profit, it's</p> <p>14 ACA who paid for it. You want to get specific.</p> <p>15 Q Has Strategic Vision sued ACA to</p> <p>16 get a return of its deposit?</p> <p>17 A Working on it.</p> <p>18 Q Currently do have a lawsuit</p> <p>19 pending against ACA?</p> <p>20 A Not yet.</p> <p>21 Q But as damages in this case,</p> <p>22 Strategic Vision is seeking a \$1,500 expense</p> <p>23 from Bloomingdale's for your coat, right?</p> <p>24 A For my coat -- I'm not seeking</p> <p>25 damages, I'm showing expenses. When you have</p>
<p style="text-align: right;">Page 83</p> <p>1 FRENCH WALLOP</p> <p>2 Q Just bear with me a second.</p> <p>3 The very last entry is another</p> <p>4 entry to the Tumi Store, right?</p> <p>5 A Yes.</p> <p>6 Q \$418.70?</p> <p>7 A Yes.</p> <p>8 Q And you've recorded that as a</p> <p>9 business expense, right?</p> <p>10 A Yes.</p> <p>11 Q What was the nature of that</p> <p>12 business expense?</p> <p>13 A I think one was a wallet and one</p> <p>14 was a -- no, one was not a wallet. It was a</p> <p>15 laptop envelope, which was the cheaper one, and</p> <p>16 then this was the briefcase.</p> <p>17 Q Turn the page in the bank</p> <p>18 account, exhibit page 1913.</p> <p>19 A Yes.</p> <p>20 Q The very first entry, point of</p> <p>21 service debit, Bloomy's, do you see that there?</p> <p>22 A Yes.</p> <p>23 Q What's Bloomy's?</p> <p>24 A Bloomingdale's.</p> <p>25 Q And there is a Bloomingdale's</p>	<p style="text-align: right;">Page 85</p> <p>1 FRENCH WALLOP</p> <p>2 to get into the very cold winter and you have</p> <p>3 to travel to cold places and you buy yourself a</p> <p>4 coat or a suit, yes.</p> <p>5 And business expenses are</p> <p>6 allowed for clothing under IRS.</p> <p>7 Q Turn to page 1916 of the bank</p> <p>8 account, Exhibit 114, please.</p> <p>9 A Yes.</p> <p>10 Q There is an entry toward,</p> <p>11 actually the last entry on that page, it's for</p> <p>12 \$1,343.55. Do you see that?</p> <p>13 A Yes, I do.</p> <p>14 Q And that is for life insurance,</p> <p>15 is that right?</p> <p>16 A Yes, it is.</p> <p>17 Q That's a business expense as</p> <p>18 well?</p> <p>19 A Yes.</p> <p>20 Q And how do you justify that as a</p> <p>21 business expense?</p> <p>22 A Your insurance is not a business</p> <p>23 expense? My insurance is a business expense.</p> <p>24 I can allocate whatever I wish to a business</p> <p>25 expense as long as it's legal under the IRS</p>

22 (Pages 82 - 85)

<p style="text-align: right;">Page 86</p> <p>1 FRENCH WALLOP</p> <p>2 regulations, and it is legal.</p> <p>3 Q Did you consult with your</p> <p>4 accountant about the life insurance?</p> <p>5 A Always.</p> <p>6 Q With respect to this particular</p> <p>7 entry did you?</p> <p>8 A Not specifically, no.</p> <p>9 Q So, you would agree that the</p> <p>10 termination that Eastern Profit sent was</p> <p>11 effective as of March 21st, 2018, correct?</p> <p>12 A No.</p> <p>13 Q When was the -- when was the</p> <p>14 termination effective?</p> <p>15 A The termination was supposed to</p> <p>16 have been for the three months. The</p> <p>17 termination was not given to us until sometime</p> <p>18 in February, without knowledge and when -- and</p> <p>19 I believe it was at the tail end of February.</p> <p>20 I don't know what the exact date</p> <p>21 was.</p> <p>22 Q Okay, and you understood there</p> <p>23 was a 30 day termination?</p> <p>24 A I understand there is a 30 day</p> <p>25 termination, and they should have taken it to</p>	<p style="text-align: right;">Page 88</p> <p>1 FRENCH WALLOP</p> <p>2 114.</p> <p>3 A Yes.</p> <p>4 Q So just that page there, every</p> <p>5 line item in the bank statement is a business</p> <p>6 expense, correct?</p> <p>7 A Yes.</p> <p>8 Q And what's the business</p> <p>9 justification for those expenditures in April</p> <p>10 of 2018? What were you doing for Eastern</p> <p>11 Profit at that point?</p> <p>12 A Many things. We were continuing</p> <p>13 to pull information. We didn't believe that</p> <p>14 Guo was going to keep up a lawsuit when we were</p> <p>15 getting additional information bit by bit.</p> <p>16 Q So, Strategic Vision continued</p> <p>17 to do work and incur expenses in April even</p> <p>18 after the termination had taken effect,</p> <p>19 correct?</p> <p>20 A I wouldn't agree with that.</p> <p>21 Q Well, is there a single</p> <p>22 expenditure on page 1917 that you can explain</p> <p>23 in connection with the work Strategic Vision</p> <p>24 was doing for Eastern Profit?</p> <p>25 A Yes, all of it.</p>
<p style="text-align: right;">Page 87</p> <p>1 FRENCH WALLOP</p> <p>2 the end of March or to the end of April, yes.</p> <p>3 Q Okay. But even Strategic Vision</p> <p>4 would concede that the contract by the end of</p> <p>5 March was terminated, correct?</p> <p>6 MR. GREIM: Objection, calls for</p> <p>7 a legal conclusion.</p> <p>8 A I don't know. I rely on my</p> <p>9 counsel's advice.</p> <p>10 Q As the representative of</p> <p>11 Strategic Vision who's in charge of the damages</p> <p>12 calculation, you don't know when the contract</p> <p>13 was terminated?</p> <p>14 A I do know that they sent a</p> <p>15 letter -- we actually didn't get a letter</p> <p>16 stipulating a -- we just got a letter with a</p> <p>17 lawsuit, not that it had been ended.</p> <p>18 After multiple conversations</p> <p>19 with Lianchao, who had multiple conversations</p> <p>20 with Guo, he never said he was going to do it.</p> <p>21 He said we were going to work</p> <p>22 together to try to figure out how we could get</p> <p>23 more information, which is exactly what we had</p> <p>24 been doing all along.</p> <p>25 Q Let's go to page 1917 in Exhibit</p>	<p style="text-align: right;">Page 89</p> <p>1 FRENCH WALLOP</p> <p>2 Q So let's focus on the second</p> <p>3 entry, the ATM withdrawal, is it really in Abu</p> <p>4 Dhabi?</p> <p>5 A If it says I'm in Abu Dhabi,</p> <p>6 that's where I was, yes.</p> <p>7 Q Well, do you remember being in</p> <p>8 Abu Dhabi in April of 2018?</p> <p>9 A Yes.</p> <p>10 Q And what was the purpose of this</p> <p>11 ATM withdrawal that you made that you recorded</p> <p>12 as a business expense?</p> <p>13 A Probably taxis.</p> <p>14 In other words, it was an ATM</p> <p>15 debit, to get cash to pay a taxi. They don't</p> <p>16 have taxis with credit cards, gizmos.</p> <p>17 Q Then there is -- so that was</p> <p>18 on -- and what were you doing in Abu Dhabi as</p> <p>19 that relates to Eastern Profit's business in</p> <p>20 April of 2018?</p> <p>21 A Well, we were asked to come to</p> <p>22 Abu Dhabi.</p> <p>23 Q By whom?</p> <p>24 A We were asked to come to Abu</p> <p>25 Dhabi by somebody who had suggested we make a</p>

<p style="text-align: right;">Page 90</p> <p>1 FRENCH WALLOP</p> <p>2 visit.</p> <p>3 Q By whom, who was that?</p> <p>4 A I can't remember his last name.</p> <p>5 Q It wasn't anyone on behalf of</p> <p>6 Eastern Profit, right?</p> <p>7 A Could have been.</p> <p>8 Q It could have been?</p> <p>9 A Could have been.</p> <p>10 Q What's the basis for your</p> <p>11 thinking that it could have been?</p> <p>12 A Well, we were looking into a lot</p> <p>13 of potential fraud by Guo in Abu Dhabi.</p> <p>14 Q So, is your testimony that</p> <p>15 someone from Eastern Profit could have asked</p> <p>16 you to go to Abu Dhabi to look into fraud</p> <p>17 relating to Mr. Guo?</p> <p>18 A You keep saying Eastern Profit.</p> <p>19 It's ACA that sent the money, not Eastern</p> <p>20 Profit.</p> <p>21 Q My question is trying to -- what</p> <p>22 I'm driving at, I'm trying to understand the</p> <p>23 nature of the -- of your reason for recording</p> <p>24 your expenses in Abu Dhabi as business expenses</p> <p>25 chargeable to Eastern Profit.</p>	<p style="text-align: right;">Page 92</p> <p>1 FRENCH WALLOP</p> <p>2 there for a debit, Capital One online payment.</p> <p>3 Do you see that?</p> <p>4 A Yes.</p> <p>5 Q That's a credit card, I assume?</p> <p>6 A Yes.</p> <p>7 Q And the amount is \$4,781.97,</p> <p>8 right?</p> <p>9 A Yes.</p> <p>10 Q And what was the nature of those</p> <p>11 expenses?</p> <p>12 A Probably the previous month</p> <p>13 overseas in Abu Dhabi and in London.</p> <p>14 Q And how did those expenditures</p> <p>15 in Abu Dhabi and London relate to Eastern</p> <p>16 Profit?</p> <p>17 A We were still investigating his</p> <p>18 fish, as well as some of the other work that</p> <p>19 needed to be done on his case.</p> <p>20 Q Why were you still conducting</p> <p>21 investigations in April and May?</p> <p>22 A We wanted to find out exactly</p> <p>23 what was going on with him.</p> <p>24 Q Whom were you investigating in</p> <p>25 April and May?</p>
<p style="text-align: right;">Page 91</p> <p>1 FRENCH WALLOP</p> <p>2 A I have no idea.</p> <p>3 Q Turn to page 1919.</p> <p>4 Toward the bottom of the page</p> <p>5 there are two business expenses or items you</p> <p>6 have recorded in yellow, one for over \$17,000</p> <p>7 and one for \$15,000.</p> <p>8 Tell us what those are.</p> <p>9 A I think -- oh, that's easy,</p> <p>10 \$17,000 was for Fletcher and \$15,000 was to</p> <p>11 Mike's -- one of Mike's wires.</p> <p>12 Q Is there any reason those are</p> <p>13 yellow and not red?</p> <p>14 A They were a business expense to</p> <p>15 the company, right?</p> <p>16 Let me just see, what month was</p> <p>17 that, May?</p> <p>18 Yeah, there actually should have</p> <p>19 been -- they were on my sheet that way, but not</p> <p>20 on this.</p> <p>21 So I guess I was looking at it</p> <p>22 as a business expense, but they are in my</p> <p>23 actual accounting sheet.</p> <p>24 Q Turn to page 1920, please.</p> <p>25 On May 11th there is an entry</p>	<p style="text-align: right;">Page 93</p> <p>1 FRENCH WALLOP</p> <p>2 A A number of fish, including the</p> <p>3 ones that Fletcher was investigating.</p> <p>4 Q Were you investigating Mr. Guo</p> <p>5 in April?</p> <p>6 A Some of it, yes.</p> <p>7 Q So you are claiming as damages</p> <p>8 in this litigation against Eastern Profit money</p> <p>9 that you spent to investigate Mr. Guo?</p> <p>10 A Well, actually, again, it's ACA</p> <p>11 that sent the money, not Mr. Guo, right?</p> <p>12 MS. CLINE: Can you read my</p> <p>13 question back, please.</p> <p>14 (The question requested was read</p> <p>15 back by the reporter.)</p> <p>16 Q Is that right?</p> <p>17 A Yes.</p> <p>18 Q Is Strategic Vision compensating</p> <p>19 you to testify today?</p> <p>20 A No.</p> <p>21 Q Is it compensating you for your</p> <p>22 time?</p> <p>23 A No, sadly.</p> <p>24 Q Is anyone compensating you for</p> <p>25 your time in connection with this litigation?</p>

24 (Pages 90 - 93)

<p style="text-align: right;">Page 94</p> <p>1 FRENCH WALLOP</p> <p>2 A No.</p> <p>3 Q Who paid for your travel</p> <p>4 expenses to come to New York?</p> <p>5 A I did.</p> <p>6 Q Are you or Strategic Vision</p> <p>7 being compensated or reimbursed in any way by</p> <p>8 anyone for your expenses related to this</p> <p>9 lawsuit?</p> <p>10 A No.</p> <p>11 MS. CLINE: All right, let's take</p> <p>12 a break.</p> <p>13 THE VIDEOGRAPHER: The time is</p> <p>14 3:51 p.m. This is the end of video 1.</p> <p>15 We are off the record.</p> <p>16 (At this point in the proceedings</p> <p>17 there was a recess, after which the</p> <p>18 deposition continued as follows:)</p> <p>19 THE VIDEOGRAPHER: The time is</p> <p>20 4:07 p.m. We are on the record. This</p> <p>21 is video 2.</p> <p>22 Q I can't remember where we were,</p> <p>23 but let's go to page 1920 of Exhibit 114.</p> <p>24 MR. GREIM: Counsel, I want to be</p> <p>25 very clear about something. I was</p>	<p style="text-align: right;">Page 96</p> <p>1 FRENCH WALLOP</p> <p>2 MR. GREIM: 25th.</p> <p>3 There are a few wires that were</p> <p>4 made after March 25th that the witness</p> <p>5 testified to, one to Mr. Waller and one to</p> <p>6 Fletcher, that are part of the claim.</p> <p>7 I'm talking about the yellow debit</p> <p>8 column.</p> <p>9 MS. CLINE: Okay, bear with me a</p> <p>10 minute, then.</p> <p>11 Q All right, let's turn to page</p> <p>12 1915 of Exhibit 114.</p> <p>13 A Yes.</p> <p>14 Q There is a --</p> <p>15 MS. CLINE: Sorry, I've already</p> <p>16 forgotten what date cutoff you just</p> <p>17 said.</p> <p>18 MR. GREIM: March 25th.</p> <p>19 Q Okay, so let's start over.</p> <p>20 So on page 1915 there is a -- on</p> <p>21 March 1 there is a line item entry for ATM</p> <p>22 withdrawal of \$303. That was cash, right?</p> <p>23 A It appears so, yes.</p> <p>24 Q And what was the business --</p> <p>25 what did you do with the cash that was a</p>
<p style="text-align: right;">Page 95</p> <p>1 FRENCH WALLOP</p> <p>2 listening to the last round of</p> <p>3 questions, I was listening to the</p> <p>4 witness' answers here.</p> <p>5 And I did this once earlier today,</p> <p>6 I will say this again on this point now.</p> <p>7 It is not Strategic's position that</p> <p>8 it is entitled to make a claim for any of</p> <p>9 the yellow business costs on Exhibit 114</p> <p>10 that were incurred after March 25th.</p> <p>11 So I know, perhaps you're intending</p> <p>12 to go further through the months here.</p> <p>13 What the witness did was she went through</p> <p>14 and divided this between personal and</p> <p>15 business expenses for Strategic Vision.</p> <p>16 The problem is that many of these</p> <p>17 do not pertain to the Eastern Profit</p> <p>18 contract, as I think is pretty clear.</p> <p>19 And so I just want to state</p> <p>20 Strategic Vision's position on the record</p> <p>21 that its claim under the fraud claim for</p> <p>22 recovery of its costs and a rescissionary</p> <p>23 measure does not include recovery of</p> <p>24 anything after March 25th.</p> <p>25 MS. CLINE: After March?</p>	<p style="text-align: right;">Page 97</p> <p>1 FRENCH WALLOP</p> <p>2 business expense?</p> <p>3 A I have no idea. It was a year</p> <p>4 and a half ago, ATM machine.</p> <p>5 Q And then go down a few more</p> <p>6 lines. There is a debit card purchase on March</p> <p>7 13th. What is the Grace Bay Club & Spa?</p> <p>8 A That was to investigate -- there</p> <p>9 were two Chinese individuals we were tracking</p> <p>10 in the Turks & Cacos.</p> <p>11 Q So that is an expenditure --</p> <p>12 A Yes.</p> <p>13 Q -- of \$456 at a spa in Turks &</p> <p>14 Cacos?</p> <p>15 A It wasn't a spa, it was a hotel,</p> <p>16 a night, two nights.</p> <p>17 Q And your testimony is whom were</p> <p>18 you investigating?</p> <p>19 A Two Chinese characters that were</p> <p>20 on the list.</p> <p>21 Q And who was with you in Turks &</p> <p>22 Cacos?</p> <p>23 A My son was with me, but just we</p> <p>24 had separate rooms, so --</p> <p>25 Q But who -- you were there, were</p>

25 (Pages 94 - 97)

<p style="text-align: right;">Page 98</p> <p>1 FRENCH WALLOP</p> <p>2 you meeting with investigators there?</p> <p>3 A No, I was investigating on my</p> <p>4 own.</p> <p>5 Q Why did you need to be in Turks</p> <p>6 & Cacos?</p> <p>7 A Because that's where the two</p> <p>8 Chinese were those two nights.</p> <p>9 Q And what did you do to</p> <p>10 investigate them?</p> <p>11 A I suppose that when you are</p> <p>12 tracking somebody you are trying to gather</p> <p>13 intelligence, and that's what I was doing.</p> <p>14 Q That's what I am asking you</p> <p>15 about. Were you surveilling them?</p> <p>16 A Yes, to some degree, yes.</p> <p>17 Q And how did you go about that?</p> <p>18 A As anybody that does this does,</p> <p>19 you watch them, you listen, you see what they</p> <p>20 are talking about, you take photographs of</p> <p>21 them, you put it back into the basket of</p> <p>22 information that we filling.</p> <p>23 Q And are you trained in</p> <p>24 surveillance?</p> <p>25 A I am not trained in</p>	<p style="text-align: right;">Page 100</p> <p>1 FRENCH WALLOP</p> <p>2 surveillance when you were in the U.K.?</p> <p>3 A I wouldn't call it surveillance,</p> <p>4 no, but it was certainly collecting</p> <p>5 information.</p> <p>6 Q How did you collect -- what was</p> <p>7 the purpose for your trip to the U.K. other</p> <p>8 than to meet with Fletcher?</p> <p>9 A There were multiple reasons.</p> <p>10 Q What were the other ones?</p> <p>11 A To comply with what our</p> <p>12 so-called fake names that we were coming up</p> <p>13 with, thanks to Guo and Yvette's incompetence,</p> <p>14 we wanted to try to check out what was -- what</p> <p>15 the truth was, who was who.</p> <p>16 And that was happening as a</p> <p>17 result of both Team 1 and Team 2, and we were</p> <p>18 getting odds and ends of information to try to</p> <p>19 determine which individuals were fake and which</p> <p>20 ones weren't.</p> <p>21 Q How did you personally go about</p> <p>22 getting odds and ends of information?</p> <p>23 A Oh, I'm not going into that, I'm</p> <p>24 sorry. I'm just not going into that. We have</p> <p>25 many contacts, a great network around the</p>
<p style="text-align: right;">Page 99</p> <p>1 FRENCH WALLOP</p> <p>2 surveillance, no.</p> <p>3 Q Did you conduct any other</p> <p>4 surveillance yourself in connection with the</p> <p>5 Eastern Profit contract?</p> <p>6 A Yes.</p> <p>7 Q Would you describe that?</p> <p>8 A I wouldn't know where to begin,</p> <p>9 so.</p> <p>10 Q Other than at a hotel in Turks &</p> <p>11 Cacos with your son --</p> <p>12 A Yes.</p> <p>13 Q -- what activities did you</p> <p>14 undertake to engage in surveillance for Eastern</p> <p>15 Profit?</p> <p>16 A In the U.K., in the Middle East</p> <p>17 and in Switzerland.</p> <p>18 Q What did you do in the U.K.?</p> <p>19 A I think I've already mentioned</p> <p>20 Fletcher and other people that I was talking</p> <p>21 to.</p> <p>22 Q Well, Fletcher was a contractor</p> <p>23 you hired, right?</p> <p>24 A Yes.</p> <p>25 Q Did you personally engage in any</p>	<p style="text-align: right;">Page 101</p> <p>1 FRENCH WALLOP</p> <p>2 world.</p> <p>3 Q Did you personally engage in</p> <p>4 surveillance when you were in the Middle East,</p> <p>5 surveillance on behalf of Eastern Profit?</p> <p>6 A Surveillance is a wrong -- is a</p> <p>7 ridiculous word. It's not surveillance.</p> <p>8 Q So what did you do in the Middle</p> <p>9 East?</p> <p>10 A You ask questions and you talk</p> <p>11 to people and you burrow into getting answers</p> <p>12 about people that are crooks and people that go</p> <p>13 out of their way to lie and make up fake names,</p> <p>14 putting us on a fake rabbit hunt to try to find</p> <p>15 out things about people that don't exist.</p> <p>16 Q Did you personally engage in any</p> <p>17 other information gathering on behalf of</p> <p>18 Eastern Profit?</p> <p>19 A When?</p> <p>20 Q During the course of -- well,</p> <p>21 from ever, let's start there.</p> <p>22 I mean, you've told us about the</p> <p>23 U.K. and the Middle East. I am limiting it to</p> <p>24 your personal activities, information</p> <p>25 gathering, trying to understand the basis of</p>

<p style="text-align: right;">Page 102</p> <p>1 FRENCH WALLOP</p> <p>2 your experience and expertise information</p> <p>3 gathering and how you applied that here.</p> <p>4 A I don't understand the question.</p> <p>5 Would you please repeat it?</p> <p>6 Q Yes. So your testimony is that</p> <p>7 when you were in Turks & Cacos you were</p> <p>8 engaging in information gathering and</p> <p>9 surveillance, I thought you said, and I am</p> <p>10 trying to understand that was not my</p> <p>11 understanding prior to today.</p> <p>12 So I am trying to understand</p> <p>13 what other information gathering you did on</p> <p>14 behalf of Eastern Profit.</p> <p>15 A Because we were working with</p> <p>16 certain team members and individuals that were</p> <p>17 part of the overall team in collecting</p> <p>18 information.</p> <p>19 Q When you say we, you mean you</p> <p>20 and Mr. Waller?</p> <p>21 A No, myself and other people.</p> <p>22 Q Who else was with you?</p> <p>23 A I am not answering it.</p> <p>24 MR. GREIM: Well, I would say</p> <p>25 that this witness is here to talk about</p>	<p style="text-align: right;">Page 104</p> <p>1 FRENCH WALLOP</p> <p>2 That was British Airways.</p> <p>3 Q And so my question is what were</p> <p>4 you doing, where did you go for the British</p> <p>5 Airways?</p> <p>6 A London.</p> <p>7 Q Why were you in London in March</p> <p>8 to do business for Eastern Profit?</p> <p>9 A Because we were trying to</p> <p>10 salvage the mess that had been created by the</p> <p>11 people that were working with Guo in the Sherry</p> <p>12 Netherland, I guess, trying to clean up what we</p> <p>13 were trying to gather as additional</p> <p>14 intelligence.</p> <p>15 Q And what did you personally do</p> <p>16 to clean up in London in March?</p> <p>17 A I met with a number of people</p> <p>18 that were trying to be helpful.</p> <p>19 Q And who were those people?</p> <p>20 A I am not going to name them, I'm</p> <p>21 sorry.</p> <p>22 Q I'm trying to understand the</p> <p>23 justification for an expense of a trip to</p> <p>24 London for which you are seeking damages in</p> <p>25 this litigation, and are you refusing to answer</p>
<p style="text-align: right;">Page 103</p> <p>1 FRENCH WALLOP</p> <p>2 the damage calculation.</p> <p>3 She -- the questions are</p> <p>4 permissible I think to talk about what was</p> <p>5 happening to incur that charge.</p> <p>6 To talk about what other people are</p> <p>7 there I think is beyond the scope.</p> <p>8 Q Let's look, for example, at</p> <p>9 March 20th, the entry on page 1916.</p> <p>10 A Yes.</p> <p>11 Q There is a -- an entry for</p> <p>12 \$1,355. Can you tell from the information here</p> <p>13 what that purchase was for?</p> <p>14 A We have already said what that</p> <p>15 purchase was for, it was for insurance.</p> <p>16 Q Sorry. So there are two --</p> <p>17 there is an entry at the bottom of the page</p> <p>18 that says American General Life Insurance.</p> <p>19 A Yes.</p> <p>20 Q That's the one related to</p> <p>21 insurance?</p> <p>22 A Yes.</p> <p>23 Q Then there is one up higher on</p> <p>24 March 20th.</p> <p>25 A March 20th.</p>	<p style="text-align: right;">Page 105</p> <p>1 FRENCH WALLOP</p> <p>2 the question?</p> <p>3 A I am refusing to answer.</p> <p>4 Q Is your answer the same with</p> <p>5 respect to all of the purchases on page 1916</p> <p>6 through March 23rd?</p> <p>7 A These are all foreign expenses</p> <p>8 for this project.</p> <p>9 Q Yes, and I am asking you to</p> <p>10 describe the nature of the activities, the</p> <p>11 business activities you were engaged in.</p> <p>12 A I've already answered that</p> <p>13 question.</p> <p>14 Q I thought you were refusing to</p> <p>15 answer the question?</p> <p>16 A Well, that's an answer.</p> <p>17 MS. CLINE: All right, I have no</p> <p>18 further questions of this witness, but</p> <p>19 we would like to recall Mr. Waller.</p> <p>20 THE VIDEOGRAPHER: The time is</p> <p>21 4:20 p.m. We are concluded and off the</p> <p>22 record.</p> <p>23</p> <p>24</p> <p>25</p>

Page 106

1 CERTIFICATE

2

3 I, the undersigned, a Certified

4 Shorthand Reporter of the State of New

5 York, do hereby certify:

6 That the foregoing proceedings were

7 taken before me at the time and place

8 herein set forth; that any witnesses in

9 the foregoing proceedings, prior to

10 testifying, were duly sworn; that a record

11 of the proceedings was made by me using

12 machine shorthand which was thereafter

13 transcribed under my direction;

14 That the foregoing transcript is a

15 true record of the testimony given.

16 Further, that if the foregoing

17 pertains to the original transcript of a

18 deposition in a federal case before

19 completion of the proceedings, review of

20 the transcript [] was [x] was not

21 requested.

22

23 I further certify I am neither


24 financially interested in the action nor a

25 relative or employee of any attorney or

party to this action.

IN WITNESS WHEREOF, I have this

date subscribed my name.



Stephen J. Moore
RPR, CRR

Page 107

1

2 DECLARATION UNDER PENALTY OF PERJURY

3 Case Name: EASTERN v. STRATEGIC

4 Date of Deposition: November 19,

5 2019

6

7 I, FRENCH WALLOP, hereby certify

8 Under penalty of perjury under the

9 laws of the State of New York that the

10 foregoing is true and correct.

11 Executed this _____ day of

12 _____, 2019, at

13 _____.

14

15 _____

16

17

18 FRENCH WALLOP

19

20

21

22

23

24

25

Page 108

1

2 DEPOSITION ERRATA SHEET

3 Case Name: EASTERN v. STRATEGIC.

4 Name of Witness: FRENCH WALLOP

5 Date of Deposition: November 19,

6 2019

7 Reason Codes: 1. To clarify the

8 record.

9 2. To conform to the facts.

10 3. To correct transcription errors.

11 Page _____ Line _____ Reason _____

12 From _____ to _____

13 Page _____ Line _____ Reason _____

14 From _____ to _____

15 Page _____ Line _____ Reason _____

16 From _____ to _____

17 Page _____ Line _____ Reason _____

18 From _____ to _____

19 Page _____ Line _____ Reason _____

20 From _____ to _____

21 Page _____ Line _____ Reason _____

22 From _____ to _____

23 Page _____ Line _____ Reason _____

24 From _____ to _____

25

Page 109

1

2 DEPOSITION ERRATA SHEET

3 Page _____ Line _____ Reason _____

4 From _____ to _____

5 Page _____ Line _____ Reason _____

6 From _____ to _____

7 Page _____ Line _____ Reason _____

8 From _____ to _____

9 Page _____ Line _____ Reason _____

10 From _____ to _____

11 Page _____ Line _____ Reason _____

12 From _____ to _____

13 Page _____ Line _____ Reason _____

14 From _____ to _____

15 Page _____ Line _____ Reason _____

16 From _____ to _____

17 _____ Subject to the above

18 changes, I certify that the transcript is

19 true and correct.

20 _____ No changes have been

21 made. I certify that the transcript is

22 true and correct.

23

24 _____

25 FRENCH WALLOP

[& - 31]

Page 1

&	64:23 76:19 81:9	1913 83:18	2105 9:7
& 97:7,10,13,21 98:6 99:10 102:7	81:10 82:6 114 3:19 51:8,10 51:13,21 52:4	1915 96:12,20 1916 85:7 103:9 105:5	2185 1:8 4:12 21st 38:9,14 39:5 39:14,25 86:11
1	61:2,15,17 62:4,7	1917 87:25 88:22	23 42:23
1 3:21 4:6 8:18 10:25 11:5,10,16 12:2,10,17,21,24 13:12,15 15:9 19:21,22 21:16 26:8 30:11 51:23 55:3 56:18 60:4,5 61:13 63:12,14,16 63:17 67:6 94:14 96:21 100:17 108:7	76:7,8 77:23 78:2 80:17 82:24 85:8 88:2 94:23 95:9 96:12 115 3:24 69:3,6,7 117,000 25:2 11:10 33:15 11th 12:20 37:23 37:24 91:25 12 53:10 12th 53:22 55:17 55:18 56:10,11,24 13,000 69:9 1313 2:17 134,000 65:15 13th 97:7 15 21:12 36:16 47:25 48:5 15,000 66:20 74:25 91:7,10 16th 14:20,21 15:16,22,23 27:5,8 28:6,13 55:15,17 56:2,16 17,000 68:24 91:6 91:10 17,686.69 66:19 17,686.69. 69:10 18 1:8 4:12 8:7 75:21 18th 27:16,22 19 1:13 4:5 107:4 108:5 1908 81:2,3 1912 82:24	1919 91:3	24 16:16 24,000 79:7 25,000 16:2,6 56:5 56:8,17 62:8 250 37:16 250,000 53:5,6,12 53:17 54:23 55:7 55:13 59:20 63:17 63:20 64:4 66:4 75:13 76:5,5 25th 13:11 29:4 31:13 32:8 33:6 34:6 95:10,24 96:2,4,18 26th 13:21 14:17 33:10 27/28 33:2 27th 33:12 28 32:25 28th 32:24 33:15 29 32:23 33:3 29th 33:19 2:46 50:21 2:54 51:2 2nd 23:19,21
1,315 80:23 81:13 1,343.55. 85:12 1,355 103:12 1,500 84:2,22 10 3:12 36:16 43:14,14,14,15 47:19,20,23,24 48:4,7 80:23 100 12:4 48:21 58:10,13 10th 26:19 53:22 53:22 78:8 80:18 11 3:19 11/22/19 106:16 1100 2:7 111 3:8 6:20,23 10:6 111,000 25:2 112 3:11 35:3,6,15 36:8,25 39:4 42:15 43:9 47:7 113 3:14 51:6,13 51:16 52:2 58:25 59:7 60:7,19,22 61:5,24 62:3	2	2 8:22 19:14,17 20:5,6,11 24:6 25:15 26:4,7 30:13 60:4 62:4,7 64:25 67:7 94:21 100:17 108:9 2,000 78:5 79:3,10 200 56:3,25 57:2 200,000 15:25 56:4 56:11,17 62:2,9 63:17 75:14 2017 7:14 8:7,24 2018 3:21 7:14 8:8 9:4,8,12,21 10:16 10:22 11:4 32:20 36:22 51:23 53:23 69:12 86:11 88:10 89:8,20 2019 1:13 3:22 4:5 51:24 107:5,12 108:6 206.71. 82:9 20932 106:19 20th 103:9,24,25 21 3:8 2103 8:23 2104 9:2	3 3 108:10 3,000 68:22 69:15 30 1:18 5:12,19 43:12,14,14 44:15 49:15 72:21,24 73:2 86:23,24 303 96:22 31 3:22 51:24

[31st - april]

Page 2

31st 16:13,20 33 48:5 35 3:11 384,000 66:2 384,475.98. 65:24 3:00 27:10 3:51 94:14	6:00 33:22 6th 17:2	accountant's 79:18	allowed 85:6 alson 2:22
	7	accounting 91:23 accounts 56:21	american 103:18 amount 52:13
	7 3:14	accurate 9:16 54:14 77:4	53:7 54:10 56:22 66:12 69:9 74:21 74:22 92:7
	8	ach 78:5 79:16 action 23:8 106:13	amounts 15:18 52:21 70:9
	8 10:23 35:25 8th 23:23 24:3,6 25:16 26:17 36:22 41:24 42:6	106:14 activities 99:13 101:24 105:10,11	analysts 24:10 answer 31:8 38:23 46:23,24 63:6 64:18 70:23 71:9 72:15 82:21 104:25 105:3,4,15 105:16
4 4 3:11,24 4,000 48:18,20 4,781.97 92:7 405 1:14 4:14 418.70 83:6 425,000 62:13 456 97:13 475,000 65:13 66:12 490,000 77:2 4:07 94:20 4:20 105:21 4:30 20:20 4th 37:22	9	actual 10:6 59:12 81:24 91:23 adam 24:7 additional 14:23 30:16 48:6 75:5 75:15 88:15 104:13	answered 46:19 105:12 answering 102:23 answers 95:4 101:11 anybody 10:18 72:3 98:18 apartment 37:6 apiece 54:23 apparently 25:20 31:4
	9,090.66 66:3 9:00 27:11 9:30 26:13 33:12 9th 11:4,16 12:3 15:3 26:12,18	ago 46:19 97:4 agree 5:8 86:9 88:20 agreed 17:21 63:20 68:20 69:18 69:20,23 71:24 agreement 53:25 54:4 71:4 agreements 17:14 ahead 29:4 73:21 airways 104:2,5 alerting 21:18 allocate 53:20 85:24 allocated 52:12,13 54:11,16 allotted 52:20 59:21	applied 102:3 appointments 8:15 19:9 appreciate 64:20 approximately 77:2 april 87:2 88:9,17 89:8,20 92:21,25 93:5
	a	administer 4:20 admit 24:20 advice 87:9 advisors 75:18 afternoon 4:3 ago 46:19 97:4 agree 5:8 86:9 88:20 agreed 17:21 63:20 68:20 69:18 69:20,23 71:24 agreement 53:25 54:4 71:4 agreements 17:14 ahead 29:4 73:21 airways 104:2,5 alerting 21:18 allocate 53:20 85:24 allocated 52:12,13 54:11,16 allotted 52:20 59:21	answered 46:19 105:12 answering 102:23 answers 95:4 101:11 anybody 10:18 72:3 98:18 apartment 37:6 apiece 54:23 apparently 25:20 31:4
	a.m. 13:24 14:6 33:22 abbreviation 42:6 ability 48:9 able 23:24 25:7 45:25 48:21 59:11 absolutely 18:10 abu 89:3,5,8,18,22 89:24 90:13,16,24 92:13,15 aca 62:19 84:11,14 84:15,19 90:19 93:10 acceptable 43:4 access 58:5 accessible 15:3 account 15:2,11 53:3,7 55:10 63:24 64:11 65:21 76:18 79:14,16 83:18 85:8 accountant 79:20 79:23 86:4	5	applied 102:3 appointments 8:15 19:9 appreciate 64:20 approximately 77:2 april 87:2 88:9,17 89:8,20 92:21,25 93:5
5 5 48:4 5,800 65:18 50,000 61:20 75:10 75:12,15 76:12 51 3:14,19 5100 2:17 5th 14:12 17:3,8 18:7 20:15 21:7 22:24 26:22 40:10 40:14 41:13	a	administer 4:20 admit 24:20 advice 87:9 advisors 75:18 afternoon 4:3 ago 46:19 97:4 agree 5:8 86:9 88:20 agreed 17:21 63:20 68:20 69:18 69:20,23 71:24 agreement 53:25 54:4 71:4 agreements 17:14 ahead 29:4 73:21 airways 104:2,5 alerting 21:18 allocate 53:20 85:24 allocated 52:12,13 54:11,16 allotted 52:20 59:21	applied 102:3 appointments 8:15 19:9 appreciate 64:20 approximately 77:2 april 87:2 88:9,17 89:8,20 92:21,25 93:5
	6	administer 4:20 admit 24:20 advice 87:9 advisors 75:18 afternoon 4:3 ago 46:19 97:4 agree 5:8 86:9 88:20 agreed 17:21 63:20 68:20 69:18 69:20,23 71:24 agreement 53:25 54:4 71:4 agreements 17:14 ahead 29:4 73:21 airways 104:2,5 alerting 21:18 allocate 53:20 85:24 allocated 52:12,13 54:11,16 allotted 52:20 59:21	applied 102:3 appointments 8:15 19:9 appreciate 64:20 approximately 77:2 april 87:2 88:9,17 89:8,20 92:21,25 93:5
	6 1:18 3:4,8 5:12 5:19 615,000 65:19 64105 2:8 69 3:24	6	applied 102:3 appointments 8:15 19:9 appreciate 64:20 approximately 77:2 april 87:2 88:9,17 89:8,20 92:21,25 93:5
	6	administer 4:20 admit 24:20 advice 87:9 advisors 75:18 afternoon 4:3 ago 46:19 97:4 agree 5:8 86:9 88:20 agreed 17:21 63:20 68:20 69:18 69:20,23 71:24 agreement 53:25 54:4 71:4 agreements 17:14 ahead 29:4 73:21 airways 104:2,5 alerting 21:18 allocate 53:20 85:24 allocated 52:12,13 54:11,16 allotted 52:20 59:21	applied 102:3 appointments 8:15 19:9 appreciate 64:20 approximately 77:2 april 87:2 88:9,17 89:8,20 92:21,25 93:5
	6	administer 4:20 admit 24:20 advice 87:9 advisors 75:18 afternoon 4:3 ago 46:19 97:4 agree 5:8 86:9 88:20 agreed 17:21 63:20 68:20 69:18 69:20,23 71:24 agreement 53:25 54:4 71:4 agreements 17:14 ahead 29:4 73:21 airways 104:2,5 alerting 21:18 allocate 53:20 85:24 allocated 52:12,13 54:11,16 allotted 52:20 59:21	applied 102:3 appointments 8:15 19:9 appreciate 64:20 approximately 77:2 april 87:2 88:9,17 89:8,20 92:21,25 93:5

[aquarium - cash]

Page 3

aquarium 47:17 arithmetic 65:11 armed 7:18 arrangement 71:14,16 arrived 17:15 arrow 8:13 aside 34:2 78:16 79:13 80:13 asked 41:5,22 45:12 46:18 47:3 62:19 79:24 80:3 89:21,24 90:15 asking 23:2 28:5 30:5 45:7 46:10 47:6 57:3 82:17 82:18 98:14 105:9 assume 73:9 92:5 assumed 19:19 asylum 23:9 32:14 atm 89:3,11,14 96:21 97:4 attorney 80:10 106:13 attorneys 2:5,15 authorized 6:8 available 34:20 avenue 1:14 4:14 aware 58:20 72:9	bad 15:5 17:3,16 17:20,20 18:3,9,13 28:10 40:13,15 balance 48:24 65:18,23 balls 17:15 bank 3:20 51:22 59:12,13,15 60:25 81:24 82:12,23 83:17 85:7 88:5 based 36:12 44:10 48:8,25 53:3 67:10 basically 5:15 65:2 basis 7:15 18:11 72:17 90:10 101:25 basket 98:21 bates 8:22 76:7,9 80:25 bay 97:7 bear 77:20 83:2 96:9 beginning 11:11 48:19 66:11 begun 53:20 behalf 1:18 6:9 11:13 90:5 101:5 101:17 102:14 believe 11:23 12:4 30:19 35:9,19 39:7 47:11 56:9 58:15 63:5,10 67:3 75:24,24 86:19 88:13 best 21:5 22:6 44:20 45:9 73:21 80:6 better 45:8 49:5 63:6	beyond 73:18 103:7 big 37:15 38:19,20 bill 3:24 24:25 29:2 67:24,25 69:7 71:22 bit 12:20 52:19 59:7 72:20 88:15 88:15 blank 33:10 blew 40:21 41:14 bloomingdale's 83:24,25 84:5,23 bloomy's 83:21,23 board 19:2 bottom 33:5 64:25 65:25 71:24 82:8 91:4 103:17 bouncing 17:14 break 31:10 36:17 94:12 breakdown 69:15 69:20 briefcase 82:14,19 83:16 british 104:2,4 budget 48:8 building 38:19 burrow 101:11 business 3:19 34:4 51:22 52:15 60:2 60:6,10,11,14 65:17 77:13,17 78:19 79:5 80:3 80:14,21 81:12 82:20 83:9,12 84:4 85:5,17,21,22 85:23,24 88:5,8 89:12,19 90:24 91:5,14,22 95:9,15 96:24 97:2 104:8	105:11 buy 38:17,18,20 85:3 <div style="text-align: center;">c</div> c 2:2 5:21 106:1,1 cacos 97:10,14,22 98:6 99:11 102:7 calculated 53:8 calculation 87:12 103:2 calendar 3:8 6:24 6:25 7:4,10,14,23 9:15,17 10:2,3,6 10:15,19 13:3 16:19 17:7 28:17 33:2,23,24 34:3,9 34:15 37:21 39:6 39:24,24 40:8 56:2,24 calendars 7:17,18 8:10 call 18:25 25:18 54:7,12 55:11 59:17 73:6 100:3 called 5:21 41:4 100:12 calls 19:9 72:12 87:6 cancel 68:11 cancelled 26:14 70:18 capital 92:2 card 92:5 97:6 cards 89:16 case 1:8 4:11 12:8 31:5 65:22 82:17 84:8,21 92:19 106:10 107:3 108:3 cash 89:15 96:22 96:25
<div style="text-align: center;">b</div> b 1:18 3:6 5:12,19 back 14:19 16:25 17:14,22 26:18 28:24 37:20 38:9 40:6,10 42:15 44:19 45:6,21 47:2,5 49:3 51:2 55:17 60:15 64:15 73:19 81:23 93:13 93:15 98:21			

[cell - correct]

Page 4

cell 43:17 cells 43:19,20 certain 43:18 48:10 73:5 102:16 certainly 21:22 26:9 100:4 certified 1:21 106:2 certify 106:3,12 107:7 109:18,21 change 10:9 changes 109:18,20 characters 97:19 charge 16:9 87:11 103:5 chargeable 90:25 cheaper 83:15 check 41:2 100:14 chinese 97:9,19 98:8 chose 47:16 circling 73:19 citibank 3:19 51:21 56:13 city 2:8 claim 95:8,21,21 96:6 claiming 77:12 93:7 clarification 5:9 clarify 4:23 108:7 clean 15:5,7 36:13 36:20 104:12,16 clear 45:24 46:3 74:19 80:25 94:25 95:18 clearest 59:11 clearly 17:20 35:14 client 24:19	cline 2:20 3:4 4:21 4:21 6:2,17 7:12 31:11 34:24 45:11 46:10 47:2 50:18 51:3,8 57:18 58:18 62:24 64:20 68:13,25 72:16 73:22 93:12 94:11 95:25 96:9,15 105:17 clothing 85:6 club 97:7 coat 84:6,7,9,23,24 85:4 code 60:16 coded 60:24 codes 108:7 coding 52:3 cold 85:2,3 collect 16:16 23:23 60:13 100:6 collecting 100:4 102:17 color 3:14 51:16 51:25 52:3 58:25 60:16,23 column 14:12 33:5 33:5 53:9 59:24 59:25 60:2,23 64:22 65:7,15 66:2,7 77:9,13,16 81:13 96:8 columns 59:8 come 17:22 56:7 79:14 89:21,24 94:4 coming 7:23 100:12 communicated 74:10	communications 36:7 company 91:15 compare 19:24 26:5 comparing 23:17 compartmentali... 62:21 compensated 94:7 compensating 93:18,21,24 compensation 54:24 59:19 63:9 66:15 76:3 compiled 25:22 completion 106:10 complex 42:24 comply 100:11 complying 16:22 compound 71:18 computer 80:8 computers 41:6 concede 87:4 concept 25:12 47:16 concern 21:22 concerned 19:21 21:9,13,20 22:3,5 concerns 21:23 concluded 105:21 conclusion 72:13 87:7 conduct 99:3 conducting 92:20 confidential 21:22 31:2 conform 108:9 confused 37:11,13 connection 55:6 77:13 88:23 93:25 99:4	consult 10:18 86:3 consultancy 69:16 contact 16:17 74:8 contacts 100:25 contemplates 43:11 continue 34:19 64:21 continued 50:24 88:16 94:18 continuing 88:12 contract 14:7,13 17:13,17 21:4 29:15 31:14 34:17 35:22 36:4 46:5 53:19 68:12,14,16 68:18 70:17 72:21 72:25 74:4 87:4 87:12 95:18 99:5 contracted 71:20 74:15 contractor 74:4 99:22 contractual 45:6 controlled 62:13 75:22 77:3 conversation 32:17 47:9,13 70:15 conversations 12:6 87:18,19 copied 9:14 copy 28:10 corner 65:12 corporate 4:25 78:18 corporation 2:6 4:9 corporaton 1:5 correct 6:10,12,15 8:20 9:8 17:5
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

[correct - document]

Page 5

22:25 26:23 29:15 33:16,17 34:14 43:13 44:8,9,11 49:24,25 50:3,4,7 50:17 53:14 54:22 56:6 57:25 61:3,8 61:22 62:4 63:21 64:24 65:4 66:14 69:16 76:14 77:19 86:11 87:5 88:6 88:19 107:10 108:10 109:19,22 correctly 55:20 69:14 correlated 60:12 correlation 59:12 correspond 14:18 52:3 61:23 corresponding 8:9 82:12 corresponds 76:12 81:15 costs 53:20 54:19 95:9,22 counsel 4:7,18 5:13 64:12 94:24 counsel's 5:8 38:24 87:9 counterclaim 1:6 1:11 5:6,17 countries 8:16 country 29:17,20 couple 79:25 course 41:18 48:22 101:20 court 1:2 4:11,15 4:19 covers 31:6 created 104:10 credit 14:24 89:16 92:5	crisis 28:23 crooks 101:12 crr 106:21 currently 84:18 cutoff 96:16 cv 1:8 4:12 d d 2:10 d.c. 26:18 da 25:7 daily 7:15 dallas 19:13 20:11 23:18,19,20,22 26:15 damage 103:2 damages 72:11 73:23,25 84:7,21 84:25 87:11 93:7 104:24 date 6:21 12:15 35:4 51:7,11 69:4 86:20 96:16 106:15 107:4 108:5 dated 106:16 dates 8:9,13 day 8:14 10:8 13:12,22 19:11 26:25 29:5,8 72:21 86:23,24 107:11 days 13:25 14:6,9 14:10,18,19,24 15:14,15,19 28:5 72:24 73:2 dead 48:12 deal 47:20 debit 61:20 78:5,5 83:21 84:2 89:15 92:2 96:7 97:6	december 8:24 37:9,22,23,25 38:9 39:5,14,24 decide 23:12 53:15 53:16 decided 19:16 47:25 53:2 decipher 15:21 declaration 107:2 deduction 78:15 deductions 52:15 deep 43:7 defendant 1:6,11 5:6 define 54:8 degree 98:16 delaware 2:18 delay 18:6 deleted 19:4 delineated 60:25 deliver 41:23 67:13 delivering 32:4 delivery 16:22 demand 15:18 depart 27:22 28:3 33:22 depends 54:8 deponents 5:2 deposit 84:16 deposition 1:17 4:6,13,24,25 46:7 50:24 73:20 94:18 106:10 107:4 108:2,5 109:2 describe 7:9 34:8 36:10 65:7 67:18 73:13 99:7 105:10 described 6:19 35:2 51:5,9 69:2	designated 45:13 designee 4:25 despite 62:18 determine 100:19 dhabi 89:4,5,8,18 89:22,25 90:13,16 90:24 92:13,15 diagrams 25:17 different 25:24 60:3 73:10 direct 59:11 direction 106:7 directly 14:11 55:9 disagreeable 81:21 disburse 56:19 disbursements 70:10 disbursing 77:6 discover 40:14,17 discuss 22:12,16 23:7 32:7,12 discussed 23:3,13 24:15 39:5 47:8 47:14 discussing 29:12 44:20 dispatch 56:19 distribute 64:4 district 1:2,3 4:10 4:11 dive 43:17 dives 43:7 divide 45:10 53:3 divided 95:14 document 3:11 6:19 18:8 35:2,8 45:4,18,25 46:9,17 46:22 50:12,14 51:5,9 69:2 73:18
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

[documents - explain]

Page 6

documents 5:18 35:10 45:10 doing 10:2 11:12 25:22 29:23 48:20 48:25 87:24 88:10 88:24 89:18 98:13 104:4 donnelli 2:12 5:5 download 17:18 dr 77:6 draw 64:13 drew 53:7 55:10 64:2 drive 15:8 16:15 16:17 17:20 36:13 36:21 41:2,13 drives 15:5,6 17:3 17:16,24,25 18:4 21:16,19 40:13 41:23 driving 90:22 drop 13:11 due 26:14 duly 5:22 106:6	84:8,10,13 86:10 88:10,24 89:19 90:6,15,18,19,25 92:15 93:8 95:17 99:5,14 101:5,18 102:14 104:8 107:3 108:3 easy 76:23 91:9 eddie 5:4 72:17 edward 2:10 effect 70:16 88:18 effective 74:5 86:11,14 either 37:21 40:25 43:5,22 50:8 55:6 55:17 75:5 electronic 7:17 employee 54:21 106:13 ended 65:18,19 87:17 ends 100:18,22 engage 99:14,25 101:3,16 engaged 105:11 engaging 102:8 entails 49:23 entities 57:20 60:3 62:13 77:3 entitled 1:19 95:8 entity 58:2 67:5,7 75:17 79:6 entries 7:24 8:9,18 8:21 9:3,7,21 10:13 14:2 59:4 78:2,4 entry 10:19,23 11:5 12:20 13:21 14:13,17 15:22 16:13 17:6 18:21 19:12,25 20:16	26:12 27:9,22 32:19 33:19 39:6 39:13,24 56:2,24 61:19,20 62:2 79:3,11 80:19 82:8,13 83:3,4,20 85:10,11 86:7 89:3 91:25 96:21 103:9,11,17 envelope 83:15 equaled 69:10 errata 108:2 109:2 errors 108:10 esq 2:10,12,20 essentially 65:13 65:20 79:11 estate 38:18 europe 16:17 evidence 72:9 exact 86:20 exactly 87:23 92:22 examination 3:2 5:25 examined 5:23 example 47:15 103:8 exbt 3:8,11,14,19 3:24 excerpt 6:24 exclusively 57:14 executed 107:11 exercise 7:22 exhausted 45:16 exhibit 6:20,23 10:6 35:3,6,15,25 36:7,25 39:4 42:15 43:9 44:14 47:7,7 51:4,6,10 51:16,20 52:2,4 58:25 59:7,9 60:7	60:19,22 61:2,5,5 61:15,16,24 62:3,7 64:23 69:3,5,7 76:6,19 77:23 78:2 80:17 81:9 81:10 82:6,24 83:18 85:8 87:25 94:23 95:9 96:12 exhibits 51:13 52:6,10 exist 101:15 existed 71:17 exp 16:3 expected 48:20,20 expects 84:8 expenditure 88:22 97:11 expenditures 3:15 51:17 52:24,25 63:25 88:9 92:14 expense 65:18 80:14,21 81:12 82:20 83:9,12 84:5,22 85:17,21 85:23,23,25 88:6 89:12 91:14,22 97:2 104:23 expenses 16:4,7 56:17 59:18 60:2 60:6,10,12 75:5 77:13,18 80:4 84:25 85:5 88:17 90:24,24 91:5 92:11 94:4,8 95:15 105:7 experience 102:2 expert 49:5 expertise 102:2 explain 16:12 88:22
e			
e 2:2,2 3:6 5:21 106:1,1 earlier 14:9 95:5 early 37:19 62:12 68:7 earnings 54:5,8 easiest 80:9 east 99:16 101:4,9 101:23 eastern 1:5 2:5 4:8 4:22 5:14 18:24 19:10 22:17 29:14 29:21 31:13 34:4 35:25 36:4 41:23 53:13 60:8 68:10 70:2 74:13 82:18			

[explained - fw]

Page 7

explained 9:24 explanation 72:20 explicit 34:15 40:8 extent 10:12	filed 4:10 5:18 78:22 files 24:13 fill 8:15 9:10 filled 10:24 filling 98:22 finally 36:13 financially 106:13 find 23:17 24:22 45:9 75:17 92:22 101:14 finding 19:21,22 21:9 findings 19:24 fine 41:7 finger 82:7 finish 73:8 79:8 firm 80:11 first 5:19,22 7:3 13:9 24:24 25:11 25:13 26:9 31:17 35:7 43:8,25 46:6 47:20,21,23 48:2 51:14 52:2 53:9 53:18 61:9,19 73:20 83:20 fish 3:11 26:6,8 35:12 36:16,16 42:17,25,25 43:12 43:15 46:5,15 47:16,19,20,23 48:2,4,5,12,13 67:2,3 92:18 93:2 five 26:10 76:24 flash 15:5,5,7 16:15,16 17:3,16 17:20,24,25 18:4 21:16,19 36:13,20 40:13,25 41:13,23 flat 43:11	fletcher 3:24 30:20,23 66:24 67:4,13 68:6,15 69:8 70:3,10,15 71:4 72:11 74:9 74:10 91:10 93:3 96:6 99:20,22 100:8 flew 23:22 flight 26:14 fnda 39:15 focus 59:3 60:16 89:2 focusing 65:6 77:25 follow 27:21 40:10 following 55:19 60:21 follows 5:24 50:24 94:18 foregoing 106:4,5 106:8,9 107:10 foreign 105:7 forgotten 96:16 form 55:6 forth 17:15 44:20 54:18 60:5 106:5 forward 12:19 found 47:24 48:11 foundation 39:18 39:19,20 40:4 70:22 71:8,19 72:13,18 73:12 four 61:6 frame 8:16 48:11 fraud 90:13,16 95:21 french 1:17 4:1,7 5:1 6:1 7:1 8:1 9:1 10:1 11:1 12:1 13:1 14:1,5 15:1	16:1 17:1 18:1 19:1 20:1 21:1 22:1 23:1 24:1 25:1 26:1 27:1 28:1 29:1 30:1 31:1 32:1 33:1 34:1 35:1 36:1 37:1 38:1 39:1 40:1 41:1 42:1 43:1 44:1 45:1 46:1 47:1 48:1 49:1 50:1 51:1 52:1 53:1 54:1 55:1 56:1 57:1 58:1 59:1 60:1 61:1 62:1 63:1 64:1 65:1 66:1 67:1 68:1 69:1 70:1 71:1 72:1 73:1 74:1 75:1 76:1 77:1 78:1 79:1 80:1 81:1 82:1 83:1 84:1 85:1 86:1 87:1 88:1 89:1 90:1 91:1 92:1 93:1 94:1 95:1 96:1 97:1 98:1 99:1 100:1 101:1 102:1 103:1 104:1 105:1 107:7,18 108:4 109:25 friend 41:4 full 59:13 funds 55:10 further 66:9 95:12 105:18 106:9,12 fw 13:23 42:8,11 42:13,14
--------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

[garrett - including]

Page 8

<p>g</p> <p>garrett 2:4</p> <p>gather 19:6 29:16 98:12 104:13</p> <p>gathering 25:24 29:24 34:19 101:17,25 102:3,8 102:13</p> <p>general 7:11,13 57:16 103:18</p> <p>generally 8:11 9:25</p> <p>george 4:15</p> <p>georgetown 15:24 16:7 38:20 55:9 55:22,23 56:14 57:23 58:8 62:8,9 62:25 75:2</p> <p>gertz 29:3</p> <p>getting 15:12 88:15 100:18,22 101:11</p> <p>give 31:7</p> <p>given 21:11 24:23 25:10 72:24,24 86:17 106:8</p> <p>giving 14:23</p> <p>gizmos 89:16</p> <p>go 12:19 14:19 16:25 19:16 20:11 23:18 24:11 29:25 37:20 40:6,10 44:13 47:2 48:14 50:18 60:15 65:5 65:25 73:21 79:15 80:8,17 81:7,9,23 81:25,25 87:25 90:16 94:23 95:12 97:5 98:17 100:21 101:12 104:4</p>	<p>goes 32:25 45:12 79:4,16</p> <p>going 8:14 19:20 20:8 21:20 28:17 42:15 45:5 47:19 48:4 56:18 59:3 66:6 71:22,22 73:3,19 80:8 87:20,21 88:14 92:23 100:23,24 104:20</p> <p>good 4:2 18:2 43:7</p> <p>gotten 21:15 36:20 44:24 56:20 62:18</p> <p>grace 97:7</p> <p>graph 35:13</p> <p>graves 2:4</p> <p>great 38:18,20 76:21 100:25</p> <p>green 52:12 53:9 59:23 77:9,12 81:5,6,25 82:2,2</p> <p>greim 2:10 5:4,4 31:3 38:22 45:2 45:15 46:12 50:10 64:12 70:21 71:18 72:12,19 87:6 94:24 96:2,18 102:24</p> <p>grg 56:13,16</p> <p>groundhog 19:11</p> <p>group 20:18</p> <p>guess 8:22 44:17 45:16 54:9 78:19 91:21 104:12</p> <p>guo 14:5,22 15:17 16:23 21:4,19 22:13,17,19 24:19 29:2 30:4,7,8,9 32:3 35:11 36:3,7 36:24 37:5 42:20</p>	<p>43:5 47:8 87:20 88:14 90:13,17 93:4,9,11 100:13 104:11</p> <p>guo's 21:10,10 23:9 26:6 32:13 38:16,17</p> <p>h</p> <p>h 3:6 5:21</p> <p>hackable 7:18</p> <p>half 22:11 97:4</p> <p>hamilston 2:14</p> <p>hamilton 4:22</p> <p>han 21:24 22:24 23:3 26:22,25 29:8 31:13 32:17</p> <p>hand 65:12,15</p> <p>handed 6:22 35:5 51:12</p> <p>handle 32:2</p> <p>handwriting 7:7,7 20:15 27:3 57:4</p> <p>happen 32:20</p> <p>happened 7:25 24:5 29:10</p> <p>happening 100:16 103:5</p> <p>happy 40:22 72:19</p> <p>hard 15:11 81:8</p> <p>harder 48:6</p> <p>hate 45:20</p> <p>headed 3:11</p> <p>heard 25:12</p> <p>heathrow 27:25</p> <p>held 4:13 21:21</p> <p>help 30:3</p> <p>helped 30:3</p> <p>helpful 71:11 104:18</p> <p>hermes 80:19 81:15</p>	<p>higher 103:23</p> <p>highlight 76:11</p> <p>highlighted 59:16 59:23 61:20</p> <p>highlighter 81:5</p> <p>highlights 62:7</p> <p>highly 15:20 21:22</p> <p>hill 61:10,12,23</p> <p>hire 26:4</p> <p>hired 20:6 99:23</p> <p>home 11:23 12:3 20:20,23 29:5 31:20 33:7 34:6</p> <p>honestly 13:10 38:12</p> <p>hong 62:19</p> <p>hotel 97:15 99:10</p> <p>hour 16:16 22:11 22:11</p> <p>house 12:13 38:19</p> <p>housed 79:17</p> <p>hum 59:2 65:16</p> <p>humor 33:5 71:11</p> <p>hunt 101:14</p> <p>i</p> <p>idea 50:14 91:2 97:3</p> <p>identification 6:20 35:3 51:6,10 69:3</p> <p>identify 35:7 42:19 51:15 69:5</p> <p>important 16:18 16:21 17:10 18:8 40:3</p> <p>inception 74:11</p> <p>include 66:15 95:23</p> <p>included 13:3</p> <p>including 70:10 93:2</p>
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

[income - line]

Page 9

income 79:6	interfere 32:13	51:23,23 53:23	kong 62:19
incompetence 100:13	internet 25:21 34:23	55:14,15,18 62:13 65:21 78:8 80:18 80:23	kraft 24:7
inconsistencies 21:14	introduced 29:2	jennifer 2:12 5:5	l
incur 70:16 88:17 103:5	investigate 93:9 97:8 98:10	jgk 4:12	l 5:21,21 27:10
incurred 95:10	investigated 48:19 67:20	joanna 2:20	laid 73:11,12
incurring 71:15 74:12	investigating 92:17,24 93:3,4 97:18 98:3	job 74:15,16	laptop 40:19,20,20 41:14 83:15
individual 43:17	investigation 68:4 74:21	johanna 4:21	law 80:10
individually 53:12	investigations 92:21	jointly 58:2	laws 107:9
individuals 97:9 100:19 102:16	investigative 67:9	june 75:8,21	lawsuit 74:17 84:18 87:17 88:14 94:9
information 15:19 16:23 21:11,15 23:18,24 25:4,6,24 28:23 30:4,6 32:4 34:20 36:12 43:3 43:6,18,21 49:3 60:13 87:23 88:13 88:15 98:22 100:5 100:18,22 101:17 101:24 102:2,8,13 102:18 103:12	investigators 98:2	justification 88:9 104:23	leak 21:18
initial 38:21 53:20	invoice 61:10,24 63:11 69:15,22	justify 85:20	leap 32:20
initially 38:17 47:19	invoices 64:9 69:18,22	k	leave 64:18
insistent 16:23	involved 13:17	k 55:3	leeway 14:9
instances 9:20	involving 12:24	kansas 2:8	left 27:15 41:8 53:6 55:10 65:15 65:22,23 66:5
instruct 38:22	irregularities 19:22	keep 31:3 62:17,20 66:6 69:23 88:14 90:18	legal 72:13 85:25 86:2 87:7
insurance 85:14 85:22,23 86:4 103:15,18,21	irs 85:6,25	kept 81:20	letter 87:15,15,16
intelligence 29:24 98:13 104:14	issue 55:3,5	keys 17:19	lexington 1:14 4:14
intending 95:11	issues 21:10	kind 82:7	lhr 27:22 28:3
intention 38:17	item 88:5 96:21	knew 18:7	liancho 20:21 22:19,24 27:5 28:7,12,25 29:8 31:25 32:7 38:2 87:19
interest 58:8	items 19:5 77:12 91:5	know 15:18 27:12 27:13,19 31:6 32:20 33:22 34:11 35:18 36:4 38:15 39:13 45:23 49:8 49:22 53:22 58:9 62:22,23 63:4,5,7 64:10,10 67:24 69:17,21 70:3,12 72:5 73:4 75:19 76:15 81:3 86:20 87:8,12,14 95:11 99:8	libbares 4:15
interested 49:9 50:6 64:22 106:13	j 1:20 106:20	knowledge 18:12 86:18	library 40:18 41:9
	january 3:21,22 9:3 10:21,23 11:4 11:16 12:3,20 13:11,21 14:12,21 15:22 16:13,19 17:2,2,8 18:7 36:22 40:10,14 41:12,24 42:6	knows 40:23 71:23	lie 101:13
			life 85:14 86:4 103:18
			limited 1:5 2:6 4:9 5:15
			limiting 101:23
			line 64:13 71:24 78:10 88:5 96:21 108:11,12,13,14

[line - moved]

Page 10

108:15,16,17,18 108:19,20,21,22 108:23,24 109:3,4 109:5,6,7,8,9,10 109:11,12,13,14 109:15,16 lines 28:11 97:6 list 42:20 97:20 listen 98:19 listening 95:2,3 litigation 7:2 22:13,17 23:4 32:7 77:14 93:8 93:25 104:25 little 12:19 59:7 73:18 llc 1:10,19 2:4,16 3:20 4:10 6:12 51:22 52:13 55:8 75:21 llcs 57:12 58:20 llp 2:14 lobby 42:4 lochnealy 24:10 london 8:12 27:16 27:17 29:5 33:8 34:5 66:24 92:13 92:15 104:6,7,16 104:24 long 22:8 46:19 85:25 longer 71:16 look 13:20 32:25 34:14 40:6 46:12 56:12 58:24 66:4 75:23 77:8 81:4 90:16 103:8 looked 25:2 looking 8:5 14:11 20:13 27:2 43:16 46:17 55:14 56:23	60:13 90:12 91:21 looks 20:19 23:23 24:4,19 26:18 27:11 28:12 37:24 39:21 52:18 55:15 lost 77:20 lot 46:4,14 48:3 71:23 90:12 love 71:11 m m 27:11 machine 97:4 106:7 main 2:7 making 34:17 48:5 malware 18:4 mansion 38:20 march 27:18,20 33:24 74:6 86:11 87:2,5 95:10,24,25 96:4,18,21 97:6 103:9,24,25 104:7 104:16 105:6 mark 6:17 34:24 51:3 68:25 marked 6:20,23 35:3,6 51:6,10,13 69:3 market 2:17 mars 18:22 massive 15:18 material 24:12 matter 1:19 4:8 7:11,13 34:5 40:25 60:8 mean 10:8 11:8 13:3,14 14:3 16:4 19:15,19 20:23 22:19 39:17 42:22 46:3 52:20 73:4 78:16 101:22	102:19 meaning 7:24 means 11:9 13:15 15:15 18:3 39:18 42:17 46:6 68:11 meant 28:3 measure 95:23 meet 20:11 29:7 30:22 37:5 100:8 meeting 11:16,20 12:12,21,23 13:7 13:16,17 14:5,22 20:20 21:2,6 22:9 22:14,18,23 23:10 23:14,22 24:2,6 25:16 26:20,21,24 27:14 28:7 29:11 31:17,24 32:7,14 35:25 37:3,8 38:6 38:13 39:2,5 41:12 50:13 98:2 meetings 11:10 39:9 member 6:11,15 members 12:2,9 12:16 13:16 15:9 19:2 102:16 memo 78:10 memory 34:11 mentioned 61:6 99:19 merits 10:19 mess 104:10 met 12:9,16 24:11 27:5 31:12 42:3 104:17 michael 2:23 16:14 28:13 35:19 35:19 38:2 39:8 39:11 40:6 75:4,6 75:12	michael's 57:12 58:5 mid 68:8 middle 99:16 101:4,8,23 mike 11:14 12:5 13:19 14:4 15:8 20:21 22:24 27:4 29:19 31:25 38:5 44:19 49:5 53:2,5 56:18 mike's 91:11,11 miles 36:3 million 37:16 mind 41:5 mine 65:22 minute 96:10 miscellaneous 52:16 misread 11:3 missouri 2:8 mistake 82:4 mitigate 72:10 mixed 56:21 monday 21:7 56:15,16 money 15:11 55:22 63:8,23 74:3,22,23 77:3 90:19 93:8,11 monitoring 18:15 month 10:8 47:21 48:2 65:10,10,14 78:16 80:13 91:16 92:12 months 86:16 95:12 moore 1:20 4:16 106:20 moved 73:17
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

[moving - pay]

Page 11

moving 46:14 multiple 87:18,19 100:9 mw 13:23 42:13 42:14	41:23 42:2,5,11 94:4 106:3 107:9 newark 16:15 night 97:16 nights 97:16 98:8 normal 22:7 notary 1:22 5:23 notations 7:11 note 9:15 16:19 18:14 40:3 notes 9:23,24 10:5 10:5,14 40:6,7,8 notice 1:20 5:16 68:10 70:2 72:22 72:23 noticed 74:16 november 1:13 4:5 8:6,7,19 107:4 108:5 number 4:12 11:3 30:2 43:11 44:7 49:23 50:2 69:18 69:23 71:25 76:7 76:18 93:2 104:17 numbers 8:23 48:6,24 76:25	office 38:19 79:18 oh 20:12 47:25 81:3 91:9 100:23 okay 10:10 14:2 27:7 31:11 51:12 59:21 60:18 61:9 64:21 65:11 66:6 66:16 67:4 81:11 86:22 87:3 96:9 96:19 old 40:19 once 95:5 ones 24:18 43:17 59:16,23 93:3 100:10,20 online 92:2 operate 35:11 oral 71:4 orange 52:17 60:2 order 17:18 31:4 60:12 organize 59:9 original 76:5 106:9 originally 10:13 48:7 outlook 7:19 overall 63:11 102:17 overseas 92:13 owe 74:21,22 owed 75:15 owned 57:14 58:2 58:11,14,21 ownership 58:7	page 3:2 8:18,22 8:23 9:2,7 33:6 43:25 44:14 52:2 61:4,5,16 62:4,7 64:25 65:5,12 76:7 77:23 80:16 80:17,24 81:10 82:6,8,24 83:17,18 85:7,11 87:25 88:4,22 91:3,4,24 94:23 96:11,20 103:9,17 105:5 108:11,12,13,14 108:15,16,17,18 108:19,20,21,22 108:23,24 109:3,4 109:5,6,7,8,9,10 109:11,12,13,14 109:15,16 pages 3:8 6:24,25 7:4,7 8:6 10:6,15 53:10 paid 37:16 55:9 64:10,11 67:25 69:11 70:9 75:14 79:5 84:11,14 94:3 pale 82:2 part 18:5 30:10,13 40:5 41:20 59:24 61:13 63:9,11 66:23 75:13 76:3 76:4 81:17,18 82:4 96:6 102:17 partially 73:24 particular 8:5 86:6 party 106:14 pay 30:17 55:12 62:15 74:24 82:19 84:9 89:15
n	n 2:2,17 5:21 name 4:15 24:8 48:14 75:17 76:16 90:4 104:20 106:15 107:3 108:3,4 named 24:9 names 21:10,12 24:23 25:8,9 36:16,19 37:16,17 43:23 48:15,16,18 48:20,21 100:12 101:13 nature 34:13 83:11 90:23 92:10 105:10 need 18:14 24:22 45:18 46:20 64:16 73:7 84:12 98:5 needed 47:14 92:19 negotiated 5:13 71:14 neighbor 41:5 neighbor's 41:10 neither 54:20 106:12 netherland 104:12 network 100:25 never 32:11 48:19 87:20 new 1:3,15,15,22 4:11,14,14,17 5:17 13:23 14:5 17:22 17:24 38:2,3,4,10	o 5:21 oath 4:20 objection 50:10 70:21 71:18 72:12 72:18 73:15 87:6 obviously 36:15 60:4 occasion 12:17 occurred 10:3 occurs 46:13 oceanic 75:11,18 75:25 odds 100:18,22	p 2:2,2 5:21 57:3,4 57:8 p.m. 1:13 4:4 27:11 51:2 94:14 94:20 105:21

[paying - provided]

Page 12

<p>paying 72:7</p> <p>payment 55:21 57:17,21,23 58:22 63:14 79:12 92:2</p> <p>payments 3:15 51:17 57:23 63:3 63:16</p> <p>payroll 78:11,13 79:3,11</p> <p>penalty 107:2,8</p> <p>pending 84:19</p> <p>people 3:12 22:23 28:25 30:3,5,10,15 30:16,18 42:20 48:24 67:10,19 99:20 101:11,12 101:12,15 102:21 103:6 104:11,17 104:19</p> <p>pepper 2:14 4:21</p> <p>percent 12:5 48:6 58:11,14</p> <p>perfectly 18:16</p> <p>period 50:11 73:8</p> <p>periods 73:5</p> <p>perjury 107:2,8</p> <p>permissible 103:4</p> <p>person 31:18 42:10,19 74:8</p> <p>personal 52:24 59:17,17,19 63:9 63:25 76:3 78:25 80:4 81:23 95:14 101:24</p> <p>personally 12:16 13:18 99:25 100:21 101:3,16 104:15</p> <p>perspective 58:10</p> <p>pertain 19:8 95:17</p>	<p>pertained 28:22</p> <p>pertains 106:9</p> <p>phone 18:25 19:9</p> <p>photographs 37:18 98:20</p> <p>physically 8:18,23 9:3,7 13:4 17:7 25:14</p> <p>piece 25:25 33:25</p> <p>pieces 25:24 26:3 26:3</p> <p>pierre 42:3,4</p> <p>ping 17:15</p> <p>place 10:16 77:21 106:4</p> <p>places 85:3</p> <p>plaintiff 1:6,11 4:8 5:6</p> <p>planned 48:7</p> <p>planning 26:4</p> <p>please 6:18 7:9 18:18 34:25 35:8 36:10 51:3 58:24 69:6 76:9 85:8 91:24 93:13 102:5</p> <p>plus 21:14 24:10 48:4 56:17 60:14</p> <p>point 9:11 15:10 16:17 17:11 20:7 21:17 24:14 38:7 38:8,15 39:6 47:7 50:22 74:8 83:20 88:11 94:16 95:6</p> <p>points 39:10</p> <p>pong 17:15</p> <p>populated 9:20</p> <p>portion 55:11</p> <p>position 95:7,20</p> <p>poss 19:25</p> <p>possible 19:13 20:3,4,5 22:13,17</p>	<p>62:21</p> <p>possibly 20:2</p> <p>post 7:18 9:15,23 9:24 10:5,14</p> <p>potential 23:3 90:13</p> <p>pounds 68:23 69:9 69:15</p> <p>power 38:7,8,14 39:6,10 47:7</p> <p>practice 10:11 28:16</p> <p>practices 7:10</p> <p>predictable 44:16 47:9 49:8,10,13,19 50:3,6</p> <p>preliminary 23:21</p> <p>present 2:22 11:19 12:3 13:4 22:23 27:6 28:14,17 41:15,19</p> <p>presented 39:10</p> <p>preserving 73:14</p> <p>presumed 68:2</p> <p>pretty 24:13 56:21 67:25 76:23 95:18</p> <p>previous 65:14 92:12</p> <p>price 68:19,21,22</p> <p>pricing 44:3,6,10 44:15 46:15 47:9 49:8,13,24 50:3,6 50:8,14</p> <p>print 7:19</p> <p>prior 28:5 29:15 54:13 102:11 106:5</p> <p>privy 64:9</p> <p>proactive 7:22 8:2</p> <p>probably 13:8 19:3 22:10 53:18</p>	<p>53:21 81:22 84:6 89:13 92:12</p> <p>problem 95:16</p> <p>proceedings 50:22 94:16 106:4,5,6,10</p> <p>process 24:16 48:4</p> <p>produced 3:8 7:2 72:2</p> <p>producing 72:4,6</p> <p>product 67:14</p> <p>professional 1:21</p> <p>profit 1:5 2:5 4:8 4:22 5:14 18:24 19:10 22:18 29:14 29:21 31:13 34:5 36:2,4 41:23 53:13 60:8 68:11 70:2 74:13 82:18 84:8,10,13 86:10 88:11,24 90:6,15 90:18,20,25 92:16 93:8 95:17 99:5 99:15 101:5,18 102:14 104:8</p> <p>profit's 89:19</p> <p>profits 54:14,15</p> <p>program 80:8</p> <p>programming 48:3</p> <p>progress 70:6</p> <p>project 18:16 28:18 29:13 53:4 54:16 105:8</p> <p>proper 73:11</p> <p>prospective 8:3,4</p> <p>protected 25:8,9 25:12</p> <p>provide 67:21</p> <p>provided 67:23 68:3</p>
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

[ps - respect]

Page 13

ps 56:25 psyber 56:10 57:2 57:7,11,13 58:13 62:3,25 63:8,13 public 1:22 5:23 pull 48:6,10,16 67:11 88:13 pulled 26:2 pulling 30:4,6 purchase 81:16 97:6 103:13,15 purchases 105:5 purpose 34:16 52:9 66:22 75:2 84:4 89:10 100:7 pursuant 1:19 pushed 24:25 put 8:12 9:25 10:3 11:17 25:25 35:15 35:20,21 37:25 38:6 39:23 40:19 40:19,20 41:10,13 42:25 45:21 46:24 52:6 53:4 64:14 98:21 putting 34:2 39:20 101:14	73:9 79:25 95:3 101:10 103:3 105:18 quickly 67:25 quoted 68:19	recollection 9:22 21:8 22:6 record 4:4 18:14 50:19,21 51:2,15 60:24 94:15,20 95:20 105:22 106:6,8 108:8 recordable 80:13 recorded 61:24 65:8 83:8 89:11 91:6 recording 4:3 90:23 records 25:8,9,12 recovery 95:22,23 red 52:18 59:4 60:16,24 61:19,20 62:6 76:11 91:13 redacted 19:6,6 33:13,16 76:16 refer 42:9 reference 56:3 referred 5:19 54:4 referring 30:18 reflected 60:7 62:4 reflection 9:16 refusing 104:25 105:3,14 regarding 28:18 39:18,19 registered 1:20 regulations 86:2 reimbursed 94:7 relate 52:2 92:15 related 5:17 29:21 60:8 94:8 103:20 relates 77:17 89:19 relating 60:4 90:17	relationship 74:11 relative 106:13 relevance 19:7 relevant 43:21 rely 87:8 remain 63:23 remember 13:6,10 17:23 22:8 28:14 29:10 34:3,12 36:23 37:3 39:2 47:12 75:18 89:7 90:4 94:22 repeat 102:5 replace 48:13 report 67:19 72:2 reporter 1:21,21 4:16,19 47:5 93:15 106:3 reports 25:19 72:4 72:6,7 represent 6:23 representative 6:5 71:13 87:10 requested 47:4 93:14 106:11 rescissionary 95:22 research 15:24 16:7 30:5 44:21 48:25 52:15 55:9 55:22,24 56:14 57:24 58:8 62:9 62:10 63:2 66:24 67:9 69:8,16 71:25 74:13 75:2 researched 42:21 67:20 respect 7:10 8:6 9:2,6 23:9 34:4 60:22 72:11 74:12 86:6 105:5
q	r		
question 7:3 9:6 22:21 35:7 39:8 39:12 44:18,23,25 47:3,4 49:5 51:14 57:4,16 70:24,25 71:9,19 72:15 74:7 76:21 79:9 90:21 93:13,14 102:4 104:3 105:2 105:13,15 questions 20:15 38:24 45:5,17,22 46:14,18,22,25	r 2:2 5:21 106:1 rabbit 101:14 raising 45:5 ramsland 24:9,15 reach 70:3 reached 71:4 read 13:21 18:20 26:11 27:2 47:4 93:12,14 real 25:4,5 38:18 really 28:11 33:21 43:7 49:4 58:4 74:19 89:3 realtime 1:21 reason 18:5 23:6 71:15 90:23 91:12 108:7,11,12,13,14 108:15,16,17,18 108:19,20,21,22 108:23,24 109:3,4 109:5,6,7,8,9,10 109:11,12,13,14 109:15,16 reasonable 18:16 reasons 100:9 recall 12:9 34:16 54:5 69:19 105:19 receive 63:20 received 53:12 63:22 68:10 69:25 receiving 28:24 recess 50:23 94:17 recipient 76:16 recognize 7:6		

[respectively - sorry]

Page 14

respectively 62:8 response 22:2,7 rest 33:23 result 23:13 49:23 50:2 100:17 retain 68:6 retrievable 43:3 retrievals 26:6 retrieve 23:25 34:21 retrieved 24:22 25:21 retrieving 24:16 retroactive 7:24 return 27:16 78:23,25 79:5 84:16 returns 16:15 review 106:10 ridiculous 101:7 rigging 20:18 right 6:6 7:6 8:19 8:25 11:24 14:20 20:19 27:23 28:8 31:14 33:6,9,10,13 35:5 37:13 40:9 41:25 43:12,15 44:16 45:15 54:2 54:21 57:4,24 60:15,23 61:7,21 62:14 63:25 64:5 65:12 66:13 70:11 76:13 77:8 81:16 83:4,9 84:2,11,23 85:15 90:6 91:15 92:8 93:11,16 94:11 96:11,22 99:23 105:17 rooms 97:24 round 16:16 76:25 95:2	rpr 106:21 rule 1:18 run 79:22 running 60:11,14 russell 24:8,15 s s 2:2 57:5,8 sadly 93:23 salvage 104:10 satisfy 32:5 saw 41:16,17,18 68:3 69:22 saying 45:7 64:8 72:3 90:18 says 11:5 12:21 13:12,23,24,25 14:13 18:22 19:25 20:16,22 26:12 27:10,22 33:22 39:6,14,14 40:13 44:2 56:13,24 62:3 78:10 89:5 103:18 scenario 43:8,24 43:25 49:23 50:2 50:8 schedule 7:21 scope 103:7 scrambling 23:15 screen 40:21 41:14 41:17 screens 41:11 scroll 82:7 second 5:2 12:23 19:23 44:14 58:19 61:5,16 77:23 80:17,24 81:10 83:2 89:2 see 10:25 11:2,6 12:21 13:12 14:14 17:4 19:17 27:15	39:15 40:7 42:12 42:13 43:17 44:4 45:12 46:21 47:21 48:15 53:8 67:11 73:16 78:6,11 80:19 81:5,24 82:9,10 83:21 85:12 91:16 92:3 98:19 seeking 84:22,24 104:24 seen 29:17 sense 38:13 73:6 sent 75:21 86:10 87:14 90:19 93:11 separate 67:4,7 97:24 service 83:21 services 30:18 69:16 78:11,13 79:11 set 10:24 11:5 14:25 42:24 59:8 66:9 73:5 78:16 79:13 80:13 106:5 sets 26:5 setting 11:12 15:19 16:10 54:18 80:7 setup 11:11,15 15:12 56:13 share 21:23 25:7 sharp 64:13 sheet 91:19,23 108:2 109:2 sherry 104:11 short 25:19 shorthand 106:3,7 show 16:21 25:15 35:10,11 52:11 59:11 66:2	showed 24:12 25:17,18 37:18 showing 65:18,19 84:25 shows 37:25 51:18 52:12 sign 25:4 signature 106:19 signed 14:13 17:17 35:22 53:19 similarly 25:22 simply 64:14 simultaneously 61:15 single 88:21 sitting 34:20 41:8 situation 28:23 73:10 six 76:24 size 9:25 skip 29:4 snow 42:3 sol 62:3,25 63:8,13 sole 6:11,14 solely 60:8 solutions 56:10 57:2,11,13 58:13 somebody 41:2 48:17 74:20 89:25 98:12 son 41:8,19 97:23 99:11 sorry 8:7 16:5 17:2 20:17,19 22:20 23:19 27:7 28:4 37:10,22 38:25 49:17 55:16 57:6 75:16 76:10 77:20 96:15 100:24 103:16 104:21
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

[sort - tells]

Page 15

sort 14:11 15:2 24:25 25:18 26:4 28:22 31:2 35:13 48:23 49:6 53:19 61:15 80:7,8 sorts 19:22 southern 1:3 4:11 spa 97:7,13,15 speak 53:9 specific 12:15 35:12 69:19 84:14 specifically 71:13 86:8 spell 57:7 spells 57:10 spent 93:9 split 54:5 splitting 54:13 springs 46:16 start 57:18 96:19 101:21 started 15:13 starting 61:4 starts 33:6 state 1:22 4:18 5:10 95:19 106:3 107:9 stated 5:16 statement 3:21 51:23 59:12,13,16 60:25 81:24 82:23 88:5 statements 82:12 states 1:2 steady 44:8 stephen 1:20 4:16 106:20 steps 23:12 stipulating 87:16 stop 71:14,22 73:7 74:12	store 83:4 stores 82:13 storm 42:3 straighten 84:12 strategic 1:10,18 2:15 3:9,16,20 4:9 4:24 5:7,12 6:5,9 6:12,15,25 11:13 23:8 30:17 32:13 35:10,24 36:24 43:25 49:9 50:5 51:17,21,22 52:14 53:16 54:21 55:2 55:5,12,20,21 57:17,20,22 58:21 59:14 62:12,22 63:24 64:3 67:22 68:5,9,15 69:25 70:14 71:3,12 72:8,10 74:9 76:15 77:11,17 78:14,20,21,22 79:19 82:18 84:8 84:15,22 87:3,11 88:16,23 93:18 94:6 95:15,20 107:3 108:3 strategic's 95:7 street 2:7,17 strike 58:18 62:24 68:13 subcontracting 62:16 subcontractors 63:3 subject 20:25 109:17 subscribed 106:15 subsequent 9:11 9:21 10:16 26:25 34:5	sued 84:15 suggested 89:25 suit 85:4 sunday 17:23,23 superficial 43:6 suppose 8:3 98:11 supposed 17:12 86:15 sure 12:5 22:22 26:16,16 29:12 31:25 37:8 38:23 41:7 55:16 64:7 69:13 72:19 surveillance 98:24 99:2,4,14 100:2,3 101:4,5,6,7 102:9 surveilling 98:15 sv 6:20 35:3 51:6 51:10 69:3 switzerland 99:17 sworn 5:22 106:6 system 21:19	talked 26:21 35:20 76:13 talking 30:20 38:5 39:19 40:4 49:14 50:13 72:5 96:7 98:20 99:20 tally 65:3 tank 3:11 48:13 targets 36:18 38:3 38:5 tax 55:6 78:15,22 78:25 79:5 80:12 taxes 78:16,17,19 78:19 79:4,12 taxi 89:15 taxis 89:13,16 team 10:24 11:5 11:10,16 12:2,10 12:17,21,24 13:12 13:15 14:25 15:9 15:9,13 19:13,17 19:20,21,22,24 20:5,6,11 21:16 24:6 25:15 26:4,7 26:8 30:10,13 56:18 60:4,4,5 61:13 63:12,14,16 63:17 67:6,6 100:17,17 102:16 102:17 teams 28:25 54:18 telephone 79:25 tell 9:19 20:16 21:5 27:20 28:11 33:21 38:12 45:2 47:12 52:9 59:7 71:14 81:8 91:8 103:12 telling 23:16 tells 48:18
		t	
		t 3:6 106:1,1 ta 25:7 table 3:14 24:25 51:16,25 58:25 79:22 tag 42:19 tail 86:19 take 10:16 23:8,13 31:9 34:2 42:25 47:19,20 54:17 55:16 68:11 75:23 94:11 98:20 taken 4:7 5:11 65:20,21 66:3,4 86:25 88:18 106:4 talk 37:15 101:10 102:25 103:4,6	

[ten - underway]

Page 16

ten 13:25 14:6,9 14:10,17,19,23 15:14,15,19 44:20 term 42:18 terminated 29:14 31:14 34:18 74:5 87:5,13 termination 68:10 70:2,4 72:22,23 86:10,14,15,17,23 86:25 88:18 terms 68:17 69:14 testified 5:24 96:5 testify 6:8 93:19 testifying 1:17 6:4 54:2 106:6 testimony 37:11 39:23 46:4 54:6 54:13 90:14 97:17 102:6 106:8 testing 41:6 thank 39:3 thanks 100:13 theory 73:4 thick 24:13 thing 20:19 41:11 44:19 46:15 things 7:23,25 34:22 42:13 45:6 88:12 101:15 think 12:7 15:25 20:8,13 22:10 23:18,20 24:14 27:4 28:6 29:19 37:14,14,21 38:10 39:4,7,14 43:13 55:18 56:17 63:5 63:11,13,15,16 68:8 75:4,5,7,7,19 77:5 81:18,20,20 81:22 83:13 91:9	95:18 99:19 103:4 103:7 thinking 90:11 third 42:10 thought 40:14 44:25 59:10 68:20 81:18 82:5 102:9 105:14 three 17:25 18:2 24:10 41:11 67:2 67:3 86:16 throw 48:12 tied 47:10 50:9,15 time 4:4 8:2,16 10:7 17:11 24:17 25:11,13 43:2 46:19 47:21 48:11 50:11,20,25 53:3 54:16,17 56:8 69:9 73:8 79:2,10 93:22,25 94:13,19 105:20 106:4 times 12:14 44:20 tiny 79:6 today 5:3,11 6:5 64:19 93:19 95:5 102:11 told 29:19 68:19 101:22 top 65:12 topics 5:13,16 73:20 tossed 44:19 total 66:12 76:20 track 82:11 tracking 22:22 36:17 44:21 97:9 98:12 trained 98:23,25 transaction 53:13 74:20	transcribe 10:5 transcribed 10:14 106:7 transcript 46:13 106:8,9,11 109:18 109:21 transcription 108:10 transcriptions 10:15 travel 52:15 54:17 70:11 85:3 94:3 traveling 8:12 treated 63:9 tried 64:13 trip 16:16 29:21 34:5,13,17 100:7 104:23 trips 34:4 true 106:8 107:10 109:19,22 truly 15:3 truth 23:16 100:15 try 7:12 9:18 23:15 45:9,10 49:21 87:22 100:14,18 101:14 trying 10:10 14:16 14:24 25:23 27:21 32:2 33:18 42:24 48:24 57:19 62:17 62:20 63:19 73:13 74:2 75:16 90:21 90:22 98:12 101:25 102:10,12 104:9,12,13,18,22 tuesday 11:16 tumi 82:13 83:4 turks 97:10,13,21 98:5 99:10 102:7	turn 10:21 18:17 61:16 76:6 77:22 82:24 83:17 85:7 91:3,24 96:11 turned 36:5 turning 75:8 twice 20:13 two 18:3 26:5 28:5 28:24 48:11 50:2 52:6 56:20 62:6 67:3 91:5 97:9,16 97:19 98:7,8 103:16
u			
u.k. 66:23 67:10 99:16,18 100:2,7 101:23 u.s. 3:16,20 4:10 51:18,22 um 59:2 65:16 unbalanced 48:3 underscored 13:24 undersigned 106:2 understand 10:11 14:16 22:20 35:14 38:16 46:8,16 63:19 65:2 70:23 70:25 72:17 74:2 86:24 90:22 101:25 102:4,10 102:12 104:22 understanding 50:16 63:18 69:14 72:14 73:18 75:20 76:2 102:11 understood 47:17 86:22 undertake 99:14 underway 14:7,8			

[unit - witness]

Page 17

unit 42:22 44:11	51:21,22 52:14	16:1 17:1 18:1	washington 13:16
united 1:2	53:16 54:21 55:2	19:1 20:1 21:1	38:18
units 42:23 43:12	55:5,12,20,22	22:1 23:1 24:1	watch 98:19
43:14 44:7,15	57:17,20,22 58:21	25:1 26:1 27:1	way 18:16 42:24
46:15 47:10 49:15	59:14 62:12,23	28:1 29:1 30:1	44:21 49:2,21
50:9,15	63:24 64:3 67:22	31:1 32:1 33:1	55:19,20 59:11
unpredictable	68:5,9,15 69:25	34:1 35:1 36:1	60:23 62:20 63:22
44:2,7 49:11,20,24	70:15 71:3,12	37:1 38:1 39:1	72:14 73:11 80:7
unreasonable	72:8,10 74:9	40:1 41:1 42:1	80:9 91:19 94:7
15:20	76:15 77:11 78:14	43:1 44:1 45:1,4	101:13
usb 17:19 41:2	78:20,21,22 79:19	45:24 46:1 47:1	week 15:9 23:25
use 7:14,16,18	82:18 84:8,15,22	48:1 49:1 50:1	went 20:13 23:20
8:22 35:24,25	87:3,11 88:16,23	51:1 52:1 53:1	26:17,17 28:11
59:18	93:18 94:6 95:15	54:1 55:1 56:1	34:12 41:9 47:22
usually 67:25	vision's 77:17	57:1 58:1 59:1	56:18 59:15,22
v	95:20	60:1 61:1 62:1	64:17 81:4 95:13
v 1:9 107:3 108:3	visit 90:2	63:1 64:1 65:1	whereof 106:14
vague 50:10	visual 80:9	66:1 67:1 68:1	white 38:19
various 5:18	w	69:1 70:1 71:1	wilmington 2:18
vendors 3:17	w 5:21	72:1 73:1 74:1	winter 85:2
51:19 62:15 77:7	walk 48:9	75:1 76:1 77:1	wire 15:24,25 16:6
verbal 17:13 68:16	walked 36:11,24	78:1 79:1 80:1	56:5,25 62:8,9,18
68:18	waller 2:23 11:14	81:1 82:1 83:1	74:25 75:10,21
veritext 4:17	13:19 14:4 16:14	84:1 85:1 86:1	76:12
version 25:19	20:10 22:12,16,24	87:1 88:1 89:1	wired 53:5 55:22
versus 4:9 43:6	23:3 25:15 28:8	90:1 91:1 92:1	56:8,10,16 62:13
80:4	29:7 31:12 32:6	93:1 94:1 95:1	63:8 74:3 77:3
video 4:6 94:14,21	45:8 49:22 53:11	96:1 97:1 98:1	wires 3:16 14:25
videographer 4:2	53:25 55:13,21,23	99:1 100:1 101:1	16:10 51:18 52:17
50:20,25 94:13,19	57:14 58:11,14,21	102:1 103:1 104:1	59:4 60:3,16,24
105:20	62:14 63:2,8,19	105:1 107:7,18	61:6 64:17,22
viewed 80:10	64:4 75:22 77:4,6	108:4 109:25	65:3,6,9,14 66:7,8
virginia 11:24	77:6 96:5 102:20	walmart 18:22	66:10,12,17,19
13:8 31:21	105:19	wang 2:24 36:14	76:20,24 91:11
vision 1:10,18 2:15	waller's 40:7	want 41:2 45:23	96:3
3:9,16,20 4:10,24	57:20	48:18 59:18 84:14	wish 85:24
5:7,12 6:6,9,12,15	wallet 83:13,14	94:24 95:19	withdrawal 89:3
6:25 11:13 23:8	wallop 1:17 4:1,7	wanted 16:23	89:11 96:22
30:17 32:13 35:11	5:1,2 6:1,4 7:1 8:1	19:23 23:17 42:20	withdrew 55:23
35:25 36:24 44:2	9:1 10:1 11:1 12:1	49:2 67:11 92:22	witness 5:22 38:23
49:9 50:5 51:18	13:1 14:1,5 15:1	100:14	38:25 45:7,16

[witness - zurich]

Page 18

73:14,23,25 95:4 95:13 96:4 102:25 105:18 106:14 108:4 witnesses 106:5 word 59:18 69:23 101:7 words 8:11 9:23 18:3 32:22 36:20 43:5 63:16 89:14 work 13:12 36:14 36:17 44:2 47:15 48:5,15,21 67:14 73:2,7,8,13 87:21 88:17,23 92:18 worked 56:9 working 26:7,8 65:24 71:21 84:17 102:15 104:11 world 101:2 write 7:20 8:13 17:11 28:16 written 10:13,24 28:15 82:3 wrong 43:23 44:25 101:6 wrote 8:19,23 9:3 9:8 17:2,3,7	yellow 52:16 59:25 77:16,25 81:6,25 91:6,13 95:9 96:7 yesterday 16:24 york 1:3,15,15,22 4:11,14,14,17 13:23 14:5 17:22 38:2,10 42:2,5,11 94:4 106:3 107:9 yvette 2:24 17:15 36:13 39:21 41:9 41:14 42:3 81:19 yvette's 21:15,19 100:13
	z
	zurich 27:17
x	
x 1:4,12 3:6 106:11	
y	
y 39:22 57:8 yeah 16:14 45:11 49:10 66:8,8 91:18 year 10:8 32:21 48:22,22 79:7 97:3	

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at www.veritext.com.